



**HOPWA/COVID-19:
Planning & Operating STRMU Programs
With HOPWA and CARES Act Funding**

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Presenters

Kate Briddell, HIV Housing and Health Program, Collaborative Solutions

Crystal Pope, HIV Housing and Health Program, Collaborative Solutions

OHH Staff available for questions:

Rita Harcrow - Director

Ben Ayers – Deputy Director

Amy Palilonis – Senior Program Specialist



Webinar Objectives

- Review HOPWA/COVID-19 Guidance and Information Sources
- Discuss utilization of multiple HOPWA funding streams for STRMU
- Clarify funding stream rules: HOPWA, Waiver, CARES Act, FY20
- Provide practice suggestions for STRMU operations
- Answer questions



HOPWA/COVID19 Webinar

Reminders

- Remember that waivers and program guidance issued for other programs such as CoC and ESG in most cases do not apply to HOPWA. **Make sure you are applying HUD guidance to the proper program(s).**
- As communities are deciding how to respond to the specific COVID19-related needs among PLWHA, **it is important for HOPWA grantees and project sponsors to work closely together to develop a response plan.** Grantees are responsible for waiver notifications and development of new procedures, so project sponsors are reminded to follow plans outlined by their grantees.

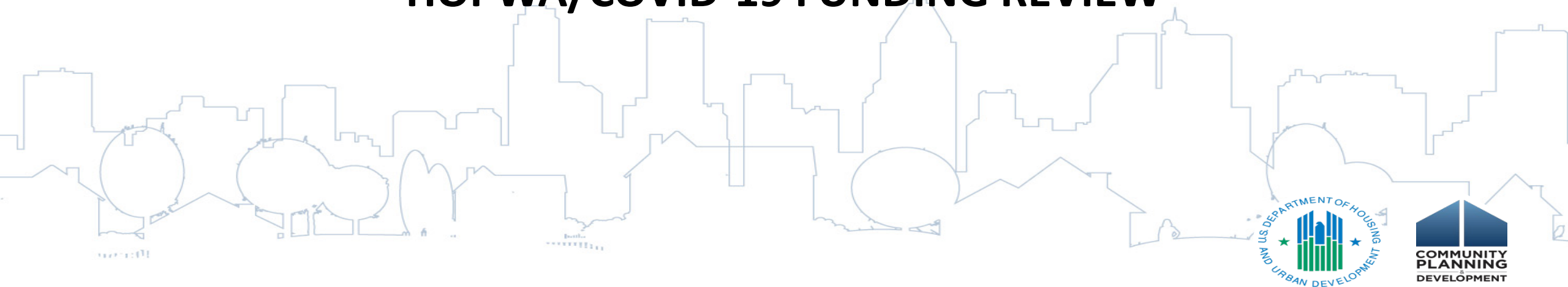


HOPWA/COVID19 Webinar Reminders

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 to the [HOPWA Listserv](#) and the HOPWA guidance for COVID-19 page on the HUD Exchange. [HOPWA COVID-19 Guidance](#)



HOPWA/COVID-19 FUNDING REVIEW



HOPWA/COVID-19 Information

Primary Sources for HOPWA/COVID-19 Information

Mega-Waiver 1	Notice CPD-20-05	Mega-Waiver 2	HOPWA Program Flexibility
4/1/2020	5-8-2020	5/22/2020	Ongoing
Waivers for HOPWA and Con Plan	CARES Act Provisions for HOPWA Explained	Waivers for HOPWA	Non-Regulatory Program Flexibilities

Find the full text of these resources at:

<https://www.hudexchange.info/programs/hopwa/covid-19/#resources-and-guidance>



HOPWA/COVID-19 Funding Streams

For **Formula HOPWA grantees**, there are 3 potential HOPWA funding streams that may be used for COVID-19 activities, including:

1. CARES Act Funding
2. FY20 Funds Designated for COVID-19
3. Regular formula HOPWA Awards

For **Competitive HOPWA grantees**, there is 1 HOPWA funding stream that is designated for COVID-19 activities:

1. CARES Act Funding
2. Competitive grantees will also continue to implement their current grants as approved and may make use of waivers



HOPWA/COVID-19 Activity Requirement

IMPORTANT REMINDER:

The supplemental grant funds authorized under the CARES Act are to be used as additional funding to maintain operations, and for rental assistance, supportive services, and other necessary actions, **in order to prevent, prepare for, and respond to COVID-19**



OPERATING A STRMU PROGRAM WITH MULTIPLE FUNDING STREAMS DURING COVID-19



Short-Term Rent Mortgage & Utility Assistance

STURM-YOU



STRUM-YOU

STRU

STIR-MOO

STRUM-OO

STROM-YOU

S.T.R.M.U.



STRMU Program Categories

STRMU funded by : Regular HOPWA Allocations	STRMU funded by: Regular HOPWA Allocations –Using the 5/22/20 Waiver option	STRMU funded by: CARES Act and by FY20 \$ designated for COVID-19
Eligible Households may receive: Up to 21 weeks of assistance in a 52-week period	Eligible Households may receive: Up to 12 months of assistance in a 12-month period as decided on an individual household basis	Eligible Households may receive: Up to 24 months of assistance



HOPWA/COVID-19 STRMU Programs

WITH 3 STRMU OPTIONS, WHERE DO WE START?

Consider your STRMU response during COVID-19 to be **one program** designed to assist those in need while your community faces the pandemic.

1. Set program goals for all STRMU assistance
2. Retool eligibility and assessment processes
3. Develop policies/procedures to guide how STRMU is provided

Note: Specific procedures WILL be needed for different funding streams, but the overall program can still be viewed and treated as one consolidated response.



CARES Act STRMU Design

Some basic STRMU/COVID-19 Design Recommendations:

- Make sure the program is set up and described as supplemental STRMU assistance needed to **prevent, prepare for, and respond to COVID-19**
- Make intake/access and assessments as **speedy and responsive** as possible
- Ensure that you add new policies & procedures, as required, but **keep them simple**
- Make decisions about the amount of assistance given to households on an **incremental basis** – not all up-front



Program Goals

Set your STRMU Program Goals, such as:



1. Prevent evictions and foreclosures
2. Prevent housing instability and homelessness
3. Respond to increased rent/mortgage/utility needs associated with COVID-19 related challenges, such as increased unemployment, reduced work hours, financial difficulty and health conditions



Eligibility and Assessment

What should we consider when developing eligibility criteria and our assessment process?

1. A speedy process and minimal restrictions or delays
2. Flexibility in assessment of household needs
3. Consideration of the community conditions caused by COVID-19
4. Knowledge of and access to additional locally available resources



Eligibility

The eligibility criteria for STRMU funded across all funding streams, including regular HOPWA allocations and CARES Act can be the same or may differ at local discretion. Remember that eligibility establishes a household's consideration for assistance, not the assistance level. **Basic STRMU criteria must include:**

- HIV+ household member required
- Household at 80% AMI or below. (May be set lower to target those most in need)
- Household must have legal residency in housing and/or responsible for utility payments
- Household must demonstrate need for the assistance.

See Eligibility and Documentation in the STRMU Guide: [HOPWA STRMU Guide](#)



Assessment and Evidence of Need

Use or adapt your normal assessment process to:

- Determine household costs and assess inability to meet those costs through review of things such as actual costs, current/future income and ability to pay, health-related conditions, etc.
- Document the need as usual but use remote methods and allow self-attestation of income and signatures when needed.

Add COVID-19 related assessment elements:

- Briefly capture any specific impact of COVID-19 on family health, interruption of employment, education, childcare resources, ability to access food/transportation, etc.
- (Note that it is NOT required to document a specific COVID impact on each individual household as the basis for providing assistance but include it when possible.)



Targeting Assistance

Grantees and Project sponsors may choose to target STRMU assistance during the COVID-19 pandemic to best meet community needs. **Strategies for targeting should be based on the amount of HOPWA funding available, other resources available, and their assessment of expected need locally.**

Some possible decision points could include:

- Targeting lower-income households (at less than 80% AMI)
- Remove existing STRMU assistance Caps (\$ level per HH, number of weeks)
- Add Caps, if needed, based on local HOPWA/COVID-19 planning
- Consider giving some priority to homeowners, for whom other emergency rent assistance programs do not apply



STRMU Assistance

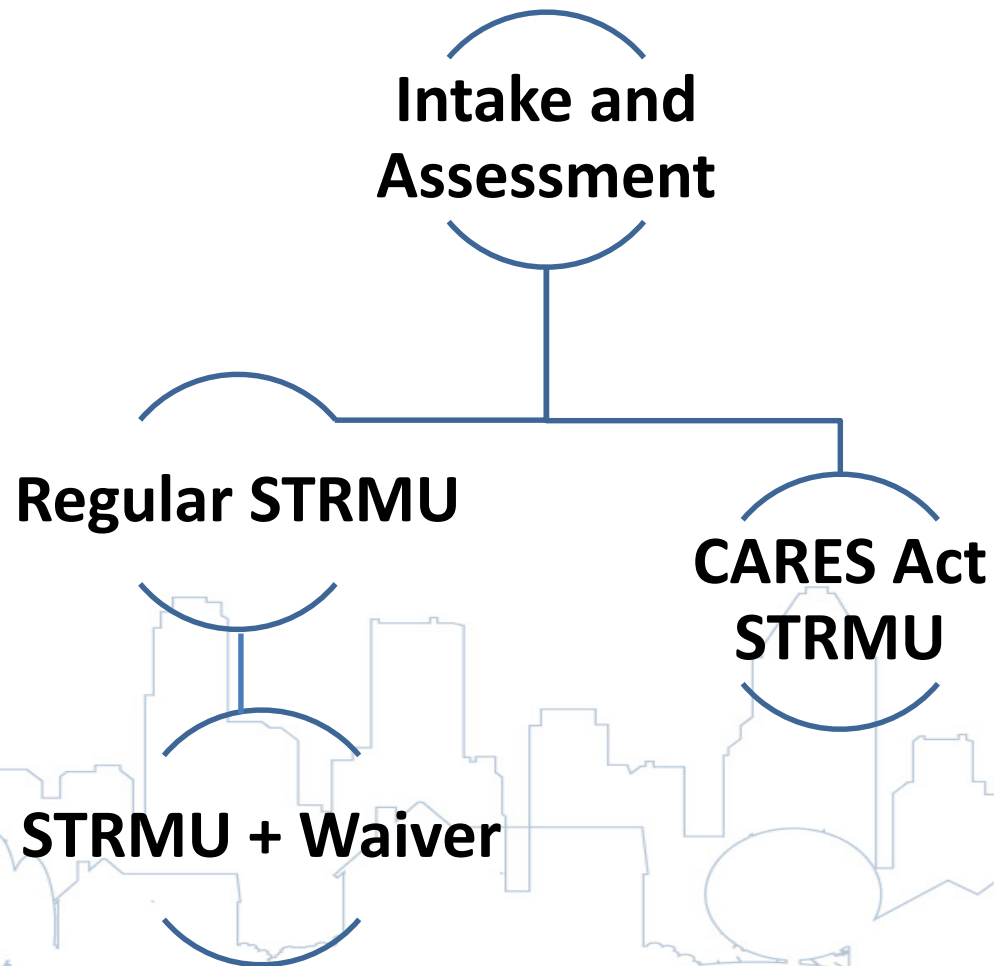
WITH 3 STRMU OPTIONS, WHERE DO WE START? HOW DO WE DECIDE HOW MUCH ASSISTANCE TO GIVE TO A HOUSEHOLD AND FROM WHICH FUNDING STREAM?

KEEP THE FOLLOWING IN MIND:

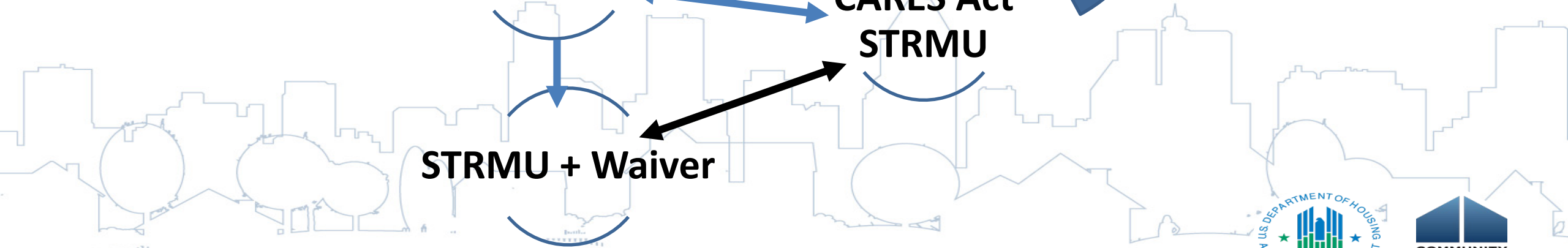
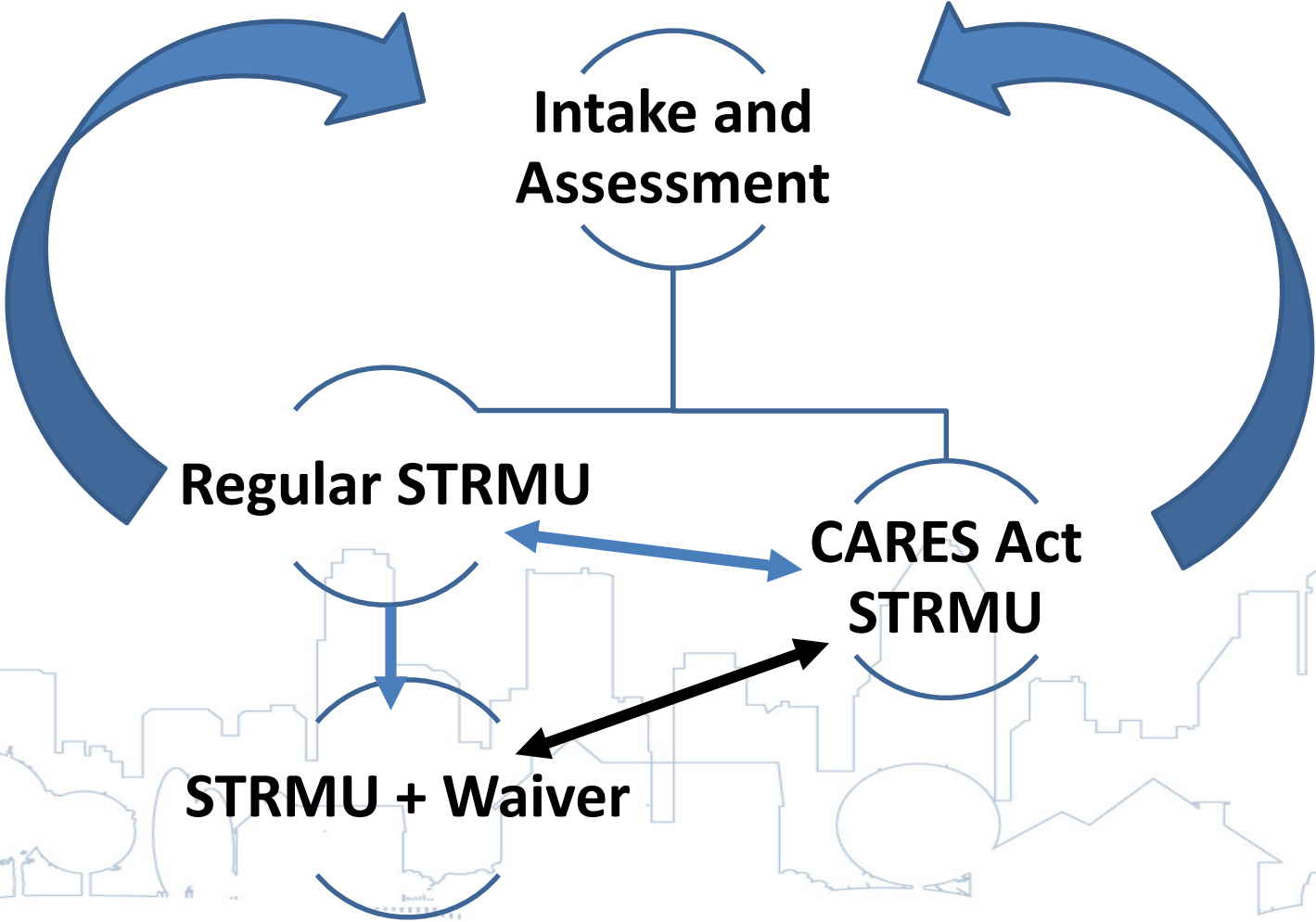
1. The decision about STRMU funding streams to use is internal to the program.
2. STRMU assistance to households may switch between funding streams over time.
3. No immediate decision must be made about how many total weeks of assistance to provide to a household. **Assistance can be granted for reasonable time increments and be subject to periodic reassessments over time.**



STRMU Options: Simplified View



STRMU Options: How it Might Really Look



REVIEW OF STRMU RULES FOR EACH FUNDING STREAM



Regular STRMU

STRMU FUNDED BY REGULAR HOPWA ALLOCATIONS:

Eligibility: Normal process plus any new targeting

Eligible STRMU Period: 52-week eligibility period, as established locally

Amount of Assistance: Up to 21-weeks of rent, mortgage, utility assistance

Documentation: All normal documentation as outlined in the [HOPWA STRMU Guide](#)

Plus any additional information about COVID-19 impact, if available

Note: Client households receiving STRMU through the “regular” HOPWA program may be moved to CARES Act STRMU (up to 24-mos) at any time based on assessed need. It is not required for households to have completed 21 weeks of regular STRMU assistance.



Regular STRMU + Waiver Option

STRMU FUNDED BY REGULAR HOPWA ALLOCATIONS and Utilizing the 5/22/20 Waiver

Eligibility: HH receiving regular STRMU but assessed as needing more than 21 weeks

Additional Eligibility: Must be determined/approved on an individual household basis

Eligible STRMU Period: Follows the 52-week eligibility period, as established locally

Amount of Assistance: Up to 52-weeks of rent, mortgage, utility assistance

Documentation: All normal documentation as outlined in the [HOPWA STRMU Guide](#) plus documentation on the extended need and any additional information about COVID-19 community and client impact

Note: Client households receiving STRMU through the Waiver Option may be moved to CARES Act STRMU (up to 24-mos) at any time based on assessed need. It is not required for households to have completed 52 weeks of regular STRMU assistance.



CARES Act STRMU

STRMU FUNDED THROUGH CARES ACT (OR FY20 FUNDS DESIGNATED FOR COVID-19)

Eligibility: Normal process plus any new targeting

Additional Eligibility: Demonstrated need beyond 21 weeks (or 52 weeks)

Eligible STRMU Period: No eligibility period applies*

Amount of Assistance: Up to 24 months of rent, mortgage, utility assistance

Documentation: All normal documentation as outlined in the [HOPWA STRMU Guide](#)

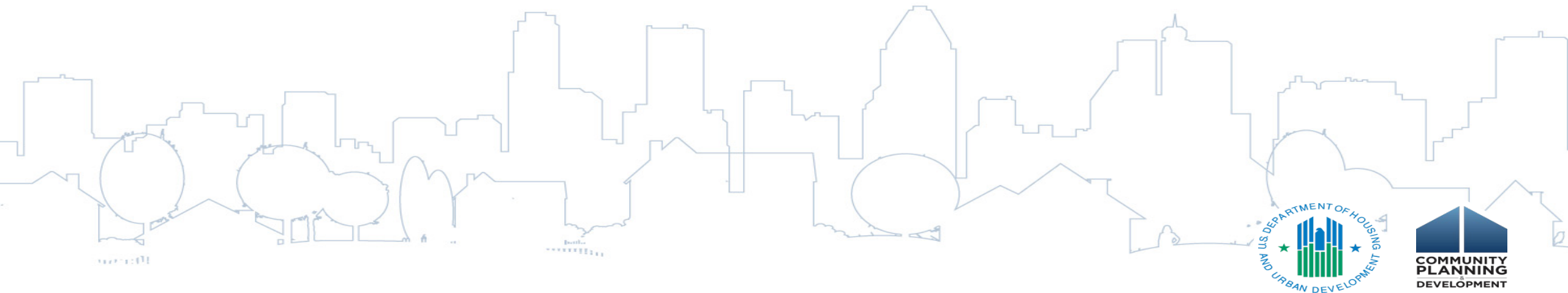
Plus any additional information about COVID-19 impact and evidence of regular reassessment of need.

* There is no eligibility period for CARES STRMU, but the amount may be limited based on funds available, contract dates and 3-year period in which CARES Act funds must be spent.



STRMU Rules Across Funding Streams

For more in-depth information on the rules governing each of the STRMU funding options, see the **HOPWA/COVID-19 STRMU Handout**, which can be downloaded during the webinar.



COVID-19 STRMU OPERATION AND PRACTICE DESIGN



Assessment

Practice Suggestions for Assessment:

**Conduct
Regular
Assessments!**

1. **Adapt existing assessment forms** to include questions relevant to COVID-19
2. Be as **flexible** as possible when assessing household needs for assistance based on the details and levels of local COVID-19 impact
3. Include direct and indirect ways the household is impacted by COVID-19 in **assessment notes**
4. Because client stability may be a longer-term (and possibly changing) issue during the pandemic, remember that you are assessing them at this point in time, but that further **assessment may be needed over time**
5. Remember that no immediate decision is needed on how many total weeks or months of STRMU should be given. Start by providing what is needed for a **reasonable time period** based on your assessment, budget and internal policies.



Assessment

Practice Suggestions for Ongoing Assessment Process:

1. Establish a **process for reassessments or check-ins** with STRMU households at regular intervals.
2. COVID-19 related impact on a family may be volatile and can change quickly. STRMU assistance to a household may need to stop and start over time but it is best to **keep cases “open” rather than treating them as one-time help**.
3. Regular assessments or check-ins can help **catch problems early**, whether rent related or for other critical family needs.
4. Ongoing assessments can also **address whether STRMU remains the best available solution** or if other rental assistance options are (or become) available.



Assessment and Support

Practice Suggestions for Ongoing Assessment and Support: Implement regular check-ins with STRMU clients as much as staffing levels allow

1. How check-ins can be conducted:

- a) By phone or video call – they can be brief
- b) Use calls as an opportunity to keep tabs on what is happening related to COVID-19, income, their housing stability, etc. and to provide COVID-19 safety tips if needed
- c) For longer-term STRMU recipients, use remote methods to help determine housing condition and safety

2. Crisis intervention – some level of crisis intervention may be needed, especially when a family does not already have a case manager, so programs should:

- a) Assess crisis needs
- b) Connect clients with another case manager when needed



Identification of Funding Source(s)

Things to consider when deciding which funding stream to use:

1. The amount of money available from Regular STRMU and CARES STRMU
2. The projected community need – how many, how much?
3. The availability and accessibility of other resources for rental and utility assistance

In order to do this, programs will need:

1. Running balances of available HOPWA STRMU and CARES STRMU funds;
2. Updated information on non-HOPWA rent/utility resources available;
3. Updates on need – how many clients are being served now and expected in future
4. An internal decision-making process



Policies and Procedures

Think of Policies & Procedures as **Who, What, When, Where, Why, and How**

Policy explain the What, Why, and When.

Procedures explain the Who and How



SAMPLE

Policy	STRMU – 52-week Waiver Implementation
What	This policy will allow project sponsors to provide STRMU to individual households for up to 52-weeks in a 52-week period based on the 5/22/20 HUD HOPWA Waiver for the one-year period from the date of the waiver.
Why	To provide on-going STRMU Assistance for individual households who need additional support beyond 21-weeks
When	This policy is in effect from 5/22/20 through 5/21/21
Procedures	
Who	Case managers will...
How	<p>...document the COVID-19 related impact on the community that is causing the clients need for longer STRMU assistance. This documentation will be placed in the client file.</p> <p>A copy of this policy must be kept in the client file for the purpose of monitoring.</p>

Policies and Procedures

Your COVID-19 STRMU (CARES & Waiver) Policies and Procedures should:

- Outline efforts regularly reassess the needs of assisted households
- Define processes for granting extensions based on documented financial needs and/or health and safety concerns
- Include criteria by which an agency will determine which source of HOPWA funds will be used for individual households and when.

If you intend to address local COVID-19 needs utilizing both normal HOPWA STRMU funding and CARES Act STRMU funding, then this policy should discuss how the CARES Act STRMU funding will be coordinated with regular HOPWA STRMU funding in addressing local needs.



HOPWA/COVID-19 Q&A

COVID-19: STRMU QUESTIONS AND ANSWERS FOR HOPWA GRANTEES AND PROJECT SPONSORS





PHP and STRMU

NEW

Q: Can PHP and STRMU be used together as a strategy to get and keep people housed when they are being impacted by COVID-19? Specifically, will it be allowed to place a household in a unit using PHP for deposits and first month's rent and then utilize STRMU to pay their rent for a period of time to keep them stable?

A: HUD's Office of HIV/AIDS Housing (OHH) will temporarily allow this combination of PHP and STRMU under specific circumstances during the pandemic crisis in order to quickly house HOPWA-eligible households impacted by COVID-19 and ensure that they remain stable for a reasonable period of time. In order to implement PHP + STRMU as a HOPWA housing strategy, it must be linked to the CARES Act requirements to prepare for, prevent or respond to COVID-19. As such, the following requirements must be met:

1. The household must be experiencing a housing crisis due to COVID-19 related issues, such as evictions after moratoriums are lifted, loss of or downturn of employment, loss of unemployment or other benefits or income, or other similar circumstances tied to the impact of COVID-19 in the community;
2. **At least one of the HOPWA activities utilized (either PHP or STRMU) must be funded using CARES Act funds;** and
3. The grantee should develop policies and procedures for the approved use of combined PHP and STRMU, including a requirement to provide ongoing case management to monitor stability and provide housing planning for these households while assisted and to plan alternatives when the CARES Act funding is depleted.



STRMU Clarifications

Reminders on STRMU Limitations:

- STRMU (funded either through regular HOPWA allocations and through CARES Act funds) **may not** be used to assist households receiving HOPWA TBRA, Section 8/HCV or any other long-term rental assistance during the same time period. This includes scenarios in which the household fell behind on their rent portion or utility payments. Other, non-HOPWA funds would be needed to assist with those arrearages
- NOTE: Only one “overlap” of funding is allowed: TBRA or STRMU recipients can receive hotel/motel vouchers to allow for isolation of one or more members while they are actively receiving TBRA or STRMU rental assistance.



STRMU Q&A

Q: When providing STRMU assistance using the CARES Act supplemental funding, is there a requirement to capture how COVID-19 is impacting the client before approving assistance.

A: It is not required to document a specific COVID-19 impact on each assisted household, such as documenting a positive virus test result or that they were laid off specifically due to COVID-19.

However, program staff should include in their assessment or case notes any direct impact such as these items, if available, but should also refer to the general impact of COVID-19 in the community such as increased unemployment, safety concerns, increased housing costs, etc. that have impacted the household. Remember, CARES funds must be used to prevent, prepare for and respond to COVID-19.



STRMU Q&A

Q: Does the 52-week rule for STRMU comes into play at all with CARES Act-funded STRMU?

A: No, the 52-week “rule” refers to the eligibility period used under regular HOPWA allocations, in which you can provide up to 21 weeks of assistance in a 52-week period. The 52-week eligibility period for a client has no impact on the (up to) 24 months of CARES Act STRMU that client could receive. For example, a client could receive 10 weeks of assistance under regular HOPWA, then be switched to CARES Act HOPWA and still be potentially able to receive a full 24 months of STRMU without regards to the regular program’s eligibility period.



Regular STRMU + Waiver Option

Q: If we are delivering STRMU through our regular HOPWA awards and have opted to utilize the waiver to extend some households beyond 21 weeks up to 52 weeks, what do we need to do differently?

A: Generally, your program can continue as is, with the following additions when using the waiver to extend STRMU assistance:

- Must establish **written policies & procedures** outlining how extensions are granted on a per household level and requiring regular reassessment of the needs of assisted households
- Document good faith efforts to assist the household within the normal 21-week limit



CARES Act STRMU + FY20 Designated \$

Q: If we are delivering STRMU through CARES Act and FY 20 funds, what do we need to do differently?

A: STRMU funded with CARES/FY20 funds must follow basic STRMU rules, but is not tied to the eligibility periods or time limits of your regular STRMU program. Additional requirements include:

- Must establish written policies & procedures outlining the process through which clients are selected, how need will be demonstrated, and requirements to regularly reassess the needs of assisted households.
- Must document good faith efforts to assist the household within the normal 21-week limit (or 52-week limit if applicable) and reasons why additional time is needed
- Must ensure that FY2020 designated funds are not used until available CARES Act funds are depleted.



REMINDERS

1. Make sure the program is set up and described as supplemental STRMU assistance needed to **prevent, prepare for, and respond to COVID-19**
2. Think of the STRMU you are providing as **ONE PROGRAM** in how it is presented to clients and the public.
3. Make decisions about the amount of STRMU assistance given to households on an **incremental basis** – not all up-front.
4. Let your program goals and your community needs guide your STRMU response.
5. Keep your STRMU policies/procedures simple but **know the funding rules!**
6. **Stay safe!**



Stay Informed

- All guidance for HOPWA grantees and project sponsors related to infectious disease preparedness and response and COVID-19 will be sent to the HOPWA Mailing List:
<https://www.hudexchange.info/maillinglist/subscribe/>
- To subscribe, enter the requested contact information, select “HOPWA – Housing Opportunities for Persons With AIDS” then select Subscribe.
- Updates on HOPWA Guidance for COVID-19 is also available on the HUD Exchange and HUD.gov:
<https://www.hudexchange.info/programs/hopwa/covid-19/#resources-and-guidance>



Resources

[HOPWA Guidance for COVID- 19 Webpage on the HUD Exchange](#)

[Mega Waiver 1 \(April 2020\), and Mega Waiver 2 \(May 2020\)](#)

Available waiver flexibilities

[CPD Director Contact Information For Waiver Notification](#)

Email addresses that must be utilized by grantees to notify CPD Directors of intent to utilize available waivers

[CPD Program Formula Allocations and CARES Act Supplemental Funding for FY2020](#)

[HOPWA Notice CPD-20-05](#)

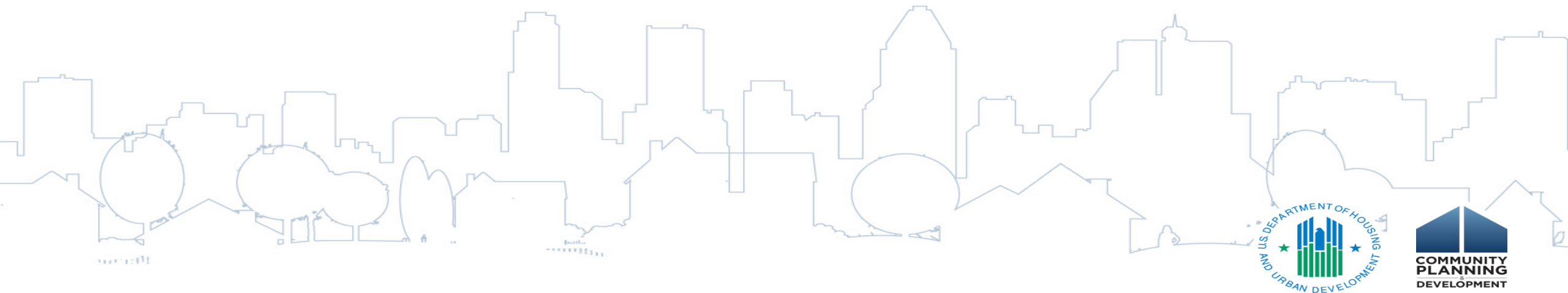
[HOPWA IDIS Set-Up and Draw Instructions for CARES Act Grants](#)



Additional Resources

NLIHC COVID-19 Rental Assistance Database:

<https://docs.google.com/spreadsheets/d/1hLfybfo9NydIptQu5wghUpKXecimh3gaoqT7LU1JGc8/edit#gid=79194074>



AAQ and TA Requests

GET ANSWERS!

GET ASSISTANCE!

Answers:

Grantee and Sponsors may ask program, policy and COVID-related questions through the HOPWA AAQ:

HOPWA Ask A Question (AAQ) Portal

Technical Assistance:

HUD is making additional technical assistance (TA) available to grantees to support HOPWA/COVID-19 planning, program development, problem-solving. Those needing TA assistance in managing COVID-19-related program issues may submit an online request through the HUD Exchange at:

<https://www.hudexchange.info/program-support/technical-assistance/>



Upcoming Webinars

Day/Date	Time	Topic
Wednesday, August 26, 2020	1:30 to 3 PM EDT	Remote Methods
Wednesday, September 2, 2020	2 – 3 PM EDT	Supportive Services



