

COLLABORATIVE SOLUTIONS, INC.

Moderator: Valencia Moss
August 19, 2020
2:52 p.m. ET

SLIDE 1

Valencia Moss: Hello everyone and thank you for joining us for the HOPWA/COVID-19: Planning & Operating STRMU Programs with HOPWA and CARES Act Funding.

Today's webinar is being recorded.

You will also receive a copy of today's PowerPoint slides and handout after the webinar has ended. If you have questions related to technical issues, please submit your questions through the chat box. If you have questions related to today's webinar, please submit those questions through the Q&A box.

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

Kate Briddell: Hello everyone and welcome. Thank you, Valencia. Collaborative Solutions is pleased to welcome you to this webinar titled Planning & Operating STRMU Programs with HOPWA and CARES Act Funding.

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Today's presenters are myself, Kate Briddell - I'm the HIV Housing and Health Program Manager at Collaborative Solutions. And joining me from Collaborative Solutions are Crystal Pope, who will be a co-presenter and Christine Campbell and Emily Fischbein who will be answering your questions.

Also on the line today are Office of HIV/AIDS Housing staff, Rita Harcrow, the Director; Amy Palilonis, the Senior Program Specialist; and Ben Ayers, Deputy Director will be joining us if he's able.

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Today's webinar objectives are to review HOPWA/COVID-19 guidance and information Sources; discuss utilization of multiple HOPWA funding streams

for STRMU; clarify funding stream rules including HOPWA, Waiver, CARES Act, and FY20; provide practice suggestions for STRMU operations; and answer your questions.

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So some reminders. Those of you who've been joining us all along these COVID-19 webinars will remember these, so remember that waivers and program guidance issued for other programs such as CoC and ESG don't apply to HOPWA in most cases. So make sure you are applying HUD guidance to the proper programs.

Also as communities are deciding how to respond to specific COVID19-related needs among Persons Living with HIV and AIDS, it's important for HOPWA grantees and project sponsors to really work closely together to develop their response plan for their community. So, grantees are responsible for making those waiver notifications to the field office and the development of new procedures to go along with those waivers, and so project sponsors are reminded to follow those plans outlined by their grantees.

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Also guidance related to funding and implementation of COVID-19 activities is constantly evolving as new information and new requirements emerge. So, HOPWA grantees and project sponsors should stay tuned using the HOPWA Listserv. There will be a link that you can click on if you aren't already signed up for it. And then HOPWA guidance listed on the COVID-19 page at the HUD Exchange and also on HUD.gov.

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So before we begin the meat of our presentation today, Rita Harcrow and Amy Palilonis wanted to give you some words. Good ones.

Amy Palilonis: Sure. Thanks Kate. And actually Rita is unfortunately having some technical difficulties, so I'll just be speaking really quick.

And so, we really just wanted to say few things before we get started today. And first, we really appreciate all of you for participating in this webinar and

for all of the hard work that you do to help people living with HIV achieve housing stability and have good health outcomes.

As we are in the midst of a global pandemic and economic downturn, and a great number of people are experiencing hardships at this time, your work to keep people housed and connected to care and support is particularly critical.

So really what the focus of the Office of HIV/AIDS Housing has been during this pandemic is to issue waivers and guidance to provide as much as flexibility and program implementation as possible, so that grantees and project sponsors can tailor their pandemic response to the needs of their community.

And we know that taking advantage of and tracking the multiple flexibilities and funding streams for COVID-19 response can add a lot more complexity to your HOPWA Program and may raise some questions and concerns for all of you.

But OHH, and our TA providers are available to assist you and will be working to continue to provide as much support and clear guidance as we can. And we really urge your take advantage of the Ask A Question portal for all questions that you have about implementing STRMU and the other eligible activities for COVID-19 response.

And if you are in need of more in-depth assistance, we definitely encourage you to submit a TA request through the HUD Exchange portal.

And we just want, you know, all of you to know that we really appreciate all the questions that you ask through the AAQ because we use those to inform our future webinars, our future guidance documents and those questions really do help us sort of tailor and come up with the type of guidance to put out in this – in this really unprecedented time.

And so that is – that's really it for us.

Kate Briddell: Thank you so much for that Amy. Crystal?

Crystal Pope: Sorry folks, a little technical difficulty on muting here. So, thank you, Amy and Kate. And welcome everyone. We just wanted to start by acknowledging that for the COVID-19 webinars we've been doing, we've tended to cram a lot of information in a very short period of time because clearly there's a lot of information coming out, new ideas, new suggestions, new waivers, new ways of running programs during the pandemic.

We know it's not always easy to listen and look at the slides, and we talk really fast sometimes, to look at the slides and submit questions in the Q&A box, all the at the same time and absorb everything.

So we really encourage you to use all the webinar PowerPoints as a resource. You can download them here. And you can also use that to go back over what was said, and then ask specific questions through the AAQ later if they're not directly answered here.

I'm going to set the stage for discussing the STRMU Program first by doing a brief review of HOPWA/COVID-19 funding streams and information sources. This information can help you understand the rules and the basic structure for HOPWA activities through the CARES Act and as a basis for developing and running your own program.

I know people have lots of very specific questions. But I think it's important also to understand where the guidance comes from and what some of the limitations are or things that you should be able to do.

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This is a brief review of HOPWA/COVID-19 information sources that can help guide you on how to operate HOPWA activities, including STRMU.

So, as new pieces of guidance have rolled out over the past few months, it's sometimes difficult even for us to keep up with the changes. So we wanted to point out, again, the major sources of guidance to help clarify that. It may also help you to locate the full text of waivers and notices that impact your program when you need those, and that link is included here in this slide.

To date, we've had two mega waivers containing HOPWA provisions that have been published, along with a notice on HOPWA related CARES Act provisions.

There have been additional memos related to reporting, IDIS Set up, the eviction moratorium and other similar topics, all of which can be found on the HUD Exchange, and hud.gov. But the three shown here have been the source of the majority of program guidance changes for HOPWA related to COVID-19. Each of these documents is listed on the resource slide at the end of the presentation as well. And we recommend that people keep those on hand, especially grantees, for reference.

SLIDE 8

So briefly just to clarify the funding streams, which of course have to be tracked and reported on separately, which is a little different for formula than competitive grantees. For formula grantees, you will have your CARES Act funding. Some grantees will have FY20 funds that they've designated through a substantial amendment to their plans that they've designated for COVID-19. If you're a project sponsor, and you don't know whether that's being done in your area, that's something that you can ask your grantee. And the third is your regular HOPWA Awards, including any unspent funds that you currently have.

For competitive grantees, they have also received CARES Act funding and can also continue to implement their current grants as approved and may in doing that make use of any of the waivers.

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We wanted to put this reminder upfront for everyone, because this language comes directly from the CARES Act and the Notice. While HOPWA/CARES Act funds may be used for a lot of different activities - we've talked about that before - all of the activities funded through CARES must be carried out in order to prevent, prepare for, and respond to COVID-19.

So, your notes, your program descriptions, and forms should reflect that language as much as possible and keep that in mind as you're making program decisions.

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We're only talking about Short-term Rent, Mortgage and Utility assistance today - an activity that's probably – that probably has the longest and most awkward name possible. Usually the use of an acronym in most cases helps but those of us who've been doing HOPWA TA and training across the country for years, tend to hear lots of different versions of how that's pronounced.

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So Short-term Rent and Mortgage and Utility assistance is also invariably known as (STRMU-YOU), (STRUM-YOU), (STRUM-YOUA), (STIR-MOO) (STROM-YOU), which we have decided that's a New Jersey thing, but (STROM-YOU), sometimes S-T-R-M-U which I personally think is kind of cheating. Occasionally just STRU, someone else this morning said (STROM), and my personal favorite is (STRUM-OO) which, so far I've only heard in the south, and I won't disclose where that came from.

I haven't been able to figure out yet whether these are regional differences are what, but if you have a version that I didn't mention, folks, all of you on this webinar, I am begging you, put it in the Q&A or e-mail it to us so we can carry this tradition forward and include your versions.

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So, next we're going to talk specifically about – that's probably the last funny thing in this webinar, but next we're going to talk specifically about the different possible funding streams you can use STRMU – for STRMU at this time.

By now, this probably looks familiar if you've been on earlier webinars. There are three basic categories if you will of STRMU or (STROM-YOU). So the first is your existing STRMU Program if you have one. I know we have some

competitive grantees that are starting one up for the first time. If you have one that is funded it is – it is funded through regular HOPWA allocations.

In this program, a client can get up to 21 weeks of assistance in a 52-week period, right? Or you may have caps in place that allow fewer weeks or a cap on the total amount that can be received. All of the normal STRMU rules apply related to eligibility, legal residency, and need.

The second is the same, that same existing STRMU Program in which you are utilizing the 5/22/20 waiver option that can be applied on an individual household basis. Approved households can receive up to 12 months of STRMU assistance when using this waiver. And that waiver – the use of the waiver is decided by grantees who must notify their field office that they will be using that.

And the third option here is STRMU that's provided using CARES Act funds or using FY20 funds that the grantee has designated for COVID-19. Remember that all CARES Act funding has to be depleted before the FY20 set aside funds are used. In this CARES Act STRMU Program, a household may receive up to 24 months of STRMU assistance.

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So where do we start? I mean, that certainly is the question for everyone. And as people are starting to get their CARES Act funds, I know that this is going to be on everybody's mind, because there are multiple funding options, yet each with their own rules, you know, it's immediately easy to go down too many rabbit holes and worry about what will happen in any one of 100 scenarios.

And while we know you have to know and work with the rules and make decisions about which funding to use for whom, a major thing we're asking you to do today is to start by looking at STRMU provided during the COVID-19 pandemic, as one program. And I mean that as outwardly facing to your community and your clients.

The, you know, that you provide rent, mortgage and utility assistance to help clients impacted by the pandemic and to reduce the risk of homelessness, and

that supplemental funding will help – will allow you some expansion and changes to the program that will help meet these needs, but it is still your one program.

We strongly recommend that one program view which would include having one set of goals, one intake and assessment form that includes your regular HOPWA, plus some CARES Act related questions.

So with that in mind, you can – you can work to set program goals for STRMU assistance, especially during this time. You can retool your eligibility and assessment process to make sure it includes the elements that you want for CARES and develop some brief additions to your policies and procedures.

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The fact that you have additional funding sources and you're trying to meet greatly increased needs in your area, and you're dealing with remote work and your own life and issues as clients are as well, it makes it even more important to keep your process – all of your processes as simple as possible. So these are just a few recommendations that we have and want to pass on to you.

Make sure your program is set up and described as - that it includes supplemental STRMU assistance to prevent, prepare for, and respond to COVID-19. We also want to make sure that intake access to the program and assessments are as speedy and responsive as possible.

You do need new policies and procedures or additions to the ones that you have where it's required. But keep them simple. This would not be the time to develop a whole new manual. And make decisions - I think this one is important and we'll repeat it, make decisions about the amount of assistance given to households on an incremental basis, not all up front. You do not have to decide that you're going to give 12 months or 18 months or 24 months of assistance to folks. You're going to be doing it incrementally is the way we think it will work best.

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It's always a good idea right to set your bottom line goals that will guide your program, such as what we have here with preventing evictions and

foreclosures, preventing housing instability and homelessness, and especially responding to what's specifically happening in your community related to COVID-19 challenges for the people that we serve. And you may have many others than that - these are just very basic.

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So what should be considered when developing eligibility criteria and the assessment process? Again, having it be a speedy process with minimal restrictions or delays will be important. We'd like to see people be as flexible as possible in the assessment of household needs knowing that everyone, everyone is in the middle of a crisis right now.

Also, you know, take into consideration the individual community conditions in your area that are caused by COVID-19. And be aware of those. And also importantly, being knowledgeable, as knowledgeable as possible, on a local level about what other kinds of resources for rent and utilities are available, so that you're not just staying in the STRMU or HOPWA silo.

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So let's talk about eligibility criteria. Eligibility for STRMU, whether it's regular or CARES Act, can be basically the same. Or it could differ, if that makes sense in your area. Remember, as it says here, that eligibility establishes the household's consideration for assistance, not the actual level of assistance they may ultimately receive.

HOPWA requires basic eligibility criteria, including those that are listed here, which should look very familiar to you if you've run a STRMU program. You can find much more in-depth information on eligibility and documentation in the HOPWA STRMU guide.

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We encourage you to use and adapt your normal assessment process where you're determining costs, and the client's ability or inability to meet those costs and why. You'll need to document need, but remember that you can also use remote methods, if needed, including the use of self-attestation of income and remote signatures.

If you and I'll add, if you haven't seen the information that's been provided about remote methods yet, we'd encourage you to visit the HOPWA COVID-19 information page on the HUD Exchange. There have been several previous webinars and fact sheets that contain some pretty good tips and suggestions on how to do remote practice.

And because you are delivering STRMU with CARES funds, you also need to add some assessment elements, including any specific impact of COVID-19 on family health, interruption of employment or other issues. But we want you to hear that it is not required to document a specific COVID-19 impact on each individual household as the basis for providing assistance. But these are factors that you want to include in the assessment and in your case notes whenever possible.

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Whenever you have limited funding to use, programs generally need to have some ideas about how to target the assistance where it's most needed. As noted here, the strategies you use for targeting should be based on the amount of HOPWA funding you have available, other resources that are available in the community, and that client assessment and an assessment of the expected need locally.

So, these are just some decision points. You could target lower income households at less than 80 percent AMI. There are lots of programs out there that do that for, both for STRMU and for TBRA and other things. We're not saying that you should, but it is a way of – bringing that down to 50 percent or 25 percent or whatever, is something that you could consider if it makes sense locally.

We strongly suggest that you look at removing any of your existing STRMU assistance caps, where you've capped the dollar amount per household or the number of weeks. Most of those caps are not going to make sense in the COVID-19 world, and that you may go back to them in the future, but right now, that is probably not something that will be helpful.

You could actually add caps, if you needed that based on what your HOPWA COVID-19 planning has revealed. So there could be, for instance, you could make a decision that instead of up to 24 months of care CARES Act STRMU, you are going to limit that to 12 months or 18 months or something of that sort. Again, it needs to be based on what you're seeing locally.

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So, keep these things in mind when you're looking at which stream of funding to use. The decision about the funding streams is – and which one to use is internal to the program. STRMU assistance to households may well switch between funding streams over time.

And remember that no immediate decision has to be made about the total number of weeks of assistance that need to be provided to a household. You want to look at granting assistance based on exactly what's happening to that client household over reasonable time increments, and subject to periodic reassessments as you, as you move forward.

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So Kate and I were trying to make a nice little diagram that could be like a flowchart to show you how this would work. But we quickly realized that there were challenges with that. So this just is a real simplified view, showing your intake and assessment and your three possible sources of funding or streams of funding for STRMU.

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But in reality, it's probably going to look more like this. And remember, this is not a chart for you to follow. This is just - illustrates how interconnected all of this is. In reality, you're going to end up moving households between categories. You may put them on regular STRMU and then do a reassessment and decide that it is best to put them on CARES Act STRMU or to use the Waiver, but you've always got that reassessment going on and the availability or the possibility of moving between categories and a lot of that's going to have to depend on what your funding is, what your funding balances are, and things like that.

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So let's quickly review the STRMU rules for each of the funding streams. We're going to do this on kind of a very summary basis. We have a document that you can download that has this more in depth for you to take a look at later.

So this one actually shows your existing or regular HOPWA program, right, funded through regular HOPWA allocations and following the normal STRMU rules and limitations, so – which includes your 52-week eligibility period, however you establish that and the up to 21 weeks of rent, mortgage and utility assistance.

Just remember that client households receiving STRMU through this regular HOPWA program, may be moved to CARES Act STRMU up to 24 months at any time based on the assessed need. It's not required for households to have completed 21 weeks of regular STRMU assistance before they're helped with CARES Act.

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So this shows your existing or regular HOPWA Program when using the 12-month waiver option. Again, this is funded with your regular HOPWA allocation and follows the same normal STRMU rules and limitations with one exception. When you utilize the Waiver option, you can increase STRMU for up to 12 months in that 12-month eligibility period. But it has to be as determined and decided on an individual household basis. So it puts that extra layer in, excuse me.

The normal rules apply for 21 weeks of assistance in a 52-week period, in this case. You would have a policy in place and documentation for determining when a household needs more than the 21 weeks in the 52-week period. And then those households may be approved for up to 12 months of assistance within that same eligibility period.

We want to also clarify that client households receiving STRMU through this category, again, I guess I'm repeating myself, can be moved to CARES Act

STRMU at any time based on your assessment. There is no requirement that you wait either the 21 weeks or the 52 weeks of regular STRMU before you move to CARES Act. And also remember that you must document the use of this waiver in your files, and the grantee must have notified the local field office about their use of the waiver.

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CARES Act funding has a combination, really, of regular HOPWA rules and things that are specific to CARES. Similar to what's needed in the Waiver, you'll need to consider additional eligibility to include a demonstrated need beyond the 21 weeks or beyond the 52 weeks, if that's what they received.

You can provide up to 24 months of rent, mortgage and utility assistance, and you must be sure to include information about the COVID-19 impact and the fact that you have implemented a regular assessment of need which is one of the things that the notice outlines.

There's – significantly, there's no eligibility period for STRMU under CARES like the 12-month one for your regular STRMU. But, there may be some limitations time-wise based on the funding that's available, what's in a sponsor's contract with the grantee, and also the three-year period in which the CARES Act funds have to be spent. There will definitely be more guidance coming out on this in the future.

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So as I mentioned, for more in depth information on the rules governing each of these, we have a handout that is attached and you can download here. It will be on the HUD Exchange shortly as well and hopefully that will provide you with some additional information.

And with that, I am going to turn it over to you, Kate.

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Kate Briddell: Thank you, Crystal. So let's talk about COVID STRMU Operation and Practice Design. I do want to just highlight a couple of things before we get started. We got some great responses from people with their STRMU pronunciations, we have one STRUMA-

Crystal Pope: STRUMA.

Kate Briddell: STRAMA, STRUMU, STRUM-YOU, STREM-YOU.

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Crystal Pope: I am so grateful. I am so grateful that people took up our challenge. Thank you so much.

Kate Briddell: We can always expect a lot from HOPWA grantees and project sponsors.

So, we have touched on the need to conduct regular assessments quite a bit so far, but we really haven't talked about what that could look like. So we have some suggestions for how this could look in practice.

Crystal in her earlier slide – the how it might look slide - You talked about the need for reassessments. Do you think that folks need to create new assessment tools for their COVID-19 response?

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Crystal Pope: No, I definitely think that better practice would be to adapt your existing assessment forms to include questions that are relevant to COVID-19. It's that this – it can be part of your treating this – if you - treating this as one program, overall, but adding questions about how the household is impacted by COVID-19, including what's happening to their health, what's happening economically, other challenges that they have had that have led them to this point. So that – that's the way we would suggest you go.

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Kate Briddell: Great, thanks. Because, since this is such an unprecedented global event, we really need to make sure that we are being as flexible as possible. So when we're assessing household needs for assistance, like Crystal said, keeping in mind adding things like, you know, whether or not your place of employment closed or if they had mass layoffs or some things that you might not normally have on your assessment forms.

You know, what are some other ways that you could exhibit flexibility, Crystal?

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Crystal Pope: In the assessment flex – well, I guess, I'm trying to think of the best way to even say this, but I think in some ways we need to be not so rigid and maybe a little more forgiving - understanding that people are living in a crisis world along with us.

And so, in some cases where a case manager might question how money has been used in the past and why people don't have money to pay their rent right now, as a basis for making a decision, I think that we have to start on the level that, that everybody is experiencing challenges and needs. And so I just think introducing some understanding, some more understanding and flexibility into the process is a good idea.

And the – oh I see, and we were thinking about the direct and indirect I'm not sure that we have exactly defined that very well. But I think in your assessment notes, and in the ongoing notes that you have in case planning, some of the direct things, very direct things that may be happening with clients is that family members, the client or family members have tested positive and have associated health challenges, right? I mean, you can't get more direct than that and unable to work because of that.

Some things that are still very much related but maybe indirect in terms of the virus impacting a person, but equally important could be, you know, job loss or hours cut. We have lots of people in the service industry who are dealing with shutdowns or slow-downs or complete closing of restaurants and so forth.

People have had trouble accessing food and other items, things like having to buy equipment or supplies for children who are attending school remotely, and those kinds of things. So just capturing that kind of impact, I think is good.

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Kate Briddell: Great, thank you so much. And because we really have no idea what's going to be happening with this pandemic, and we've seen so many changes happening across the country, with businesses opening and then closing and schools opening and then closing, we really don't know, you know, what a client's stability is going to be like, throughout this process, and so we might need to assess them more often than we expected. So they might need to do further assessments over time.

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So, as Crystal said – go ahead, Crystal.

Crystal Pope: Yes, no, I just, this is just a reminder that you don't need to make that decision up front about the total number of weeks or months of STRMU. You know, start with what is a reasonable time period. We've thrown around different time periods, but it really depends upon your staffing and the decisions that you all make locally. But you might be giving people assistance for two months at a time or three months at a time, based on what makes sense for you, and what's part of your policies.

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Kate Briddell: Great, thank you for that. So you want to make sure that you are implementing these new assessments uniformly across all of your program participants.

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So make sure that you establish a process for how you're going to do these reassessments or check-ins with your STRMU households at regular intervals. Because we don't really know what the households might need.

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Crystal Pope: Yes, I mean, we really think that that is going to be volatile and can change quickly as people lose employment, gain employment, get sick, get better, you know, all of those kinds of things that can happen over time.

And so, depending upon what your program procedures are now, I know some programs really look at STRMU as short-term, of course that's in the S, short term, is to during this time not have people necessarily reapply every time, but keep your cases open, rather than looking at them as a one time response. I think that it will – that is the kind of thing that could help with continuity and make sense in the time of COVID.

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Kate Briddell: Great, thank you. Absolutely. Because we, you know, again, things are changing so rapidly that we, we really don't know what new things might pop up. So, you know, with doing regular assessments or check-ins, it gives you an opportunity to catch problems early or later, but being able to catch those problems, whether it's rent related or related to other critical family needs. You know, there are more things that families might need at this time as Crystal mentioned with - specially related to having to outfit their homes in ways they hadn't expected to before.

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Crystal Pope: Right and, and I think it depends upon how, again, how you set up the program, and who is doing the check-ins and how that information is being kept. But that can also help identify supportive service needs that people have. You know, are they really getting the food that they need? And all of those kinds of things. So I agree that that's really important.

And so those ongoing assessments that you're doing can also help address whether STRMU - you want to keep them on STRMU, is that still the best solution for them? It's so important for grantees and project sponsors to keep their eye on what other rental assistance options are available now or become available. I know that many HOPWA and Ryan White grantees are working together to kind of balance who's going to pay for what to meet especially the housing and utility costs of folks. So I think that's important.

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Kate Briddell: Great, thank you. So, support. We've talked about assessment, and we need to talk about support. So we have some practice suggestions for ongoing assessment and support. We've suggested that you implement regular check-

ins with your STRMU clients as much as your staffing allows. And so we really need to think about how the check-ins can be conducted.

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Crystal Pope: So definitely, you can use phone or video calls - they can definitely be brief. But as I mentioned, you know, use them as an opportunity to keep tabs on what's happening with their housing stability, but also I think it's important, you know, we're kind of switching from this up to 21 weeks approach to something that is potentially much longer term.

And so having something, some questions in your, in your toolbox that you're using when you're talking with people should be included to help make sure that the housing they're in is safe, that they're not having problems with the unit or it's unsafe, or anything like that, because that would trigger – trigger trying to do other things, but usually you don't do an actual inspection. You could actually implement for longer term people, especially if there were some concerns - you could certainly implement a remote assessment and if you did not see the last webinar on Remote assessments that Cloudburst did, please download that one and take a look.

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Kate Briddell: Great, thanks for that Crystal. You know, we really are in unprecedented times. So we don't know what to expect. I know I keep saying that. But we all know that, right? So we should be ready to respond to crises as they occur. Because you might be serving clients who are new to receiving services and they might need some crisis intervention or need to be connected to other services.

So if you're STRMU workers, strictly process STRMU and aren't really aware that case management happens, you might need to connect your clients to another case manager to provide that additional support beyond just the monetary because as we've said, multiple times, you really need to make sure you're assessing for the crisis needs of your clients.

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And then there's always the question - you keep coming back to this, identifying the funding sources. So keep in mind that you need to regularly

contact talk to your fiscal folks. You'll need to know the amount of money that you have available with regular STRMU and with your CARES STRMU.

I know the second bullet is really hard to project but, you know, how many people do you think you're going to need – you'll be serving? How much money do you think that people will need to use? How much support, how long will they be needing to be on this? Does your state or your jurisdiction have a handle on the case, the, you know, the viral load, well the COVID viral load in your community so that things are starting to move to Phase two or Phase three.

You also need to keep in mind the availability and accessibility of other resources for rental and utility assistance – as Crystal mentioned there, you know, Ryan White might be an option or there's a lot of ESG money in communities just, you know, get a handle on what there's – what there is out there.

So in order to do this, you're going to need again, like I said, to talk to your fiscal folks - keep a running balance of the available funds. Know what's happening in your community around non-HOPWA rent and utility resources. And then make sure that you're talking internally at your organization. If you have multiple different programs that you are putting out there, make sure that you know that if the case management people have clients that have issues related to paying their rent, that they know that they can come to you about that.

And then really, as we stressed before, make sure that switching between sources is an internal decision-making process. This is a stressful enough time for everyone, especially our clients, we want to make sure that they have as seamless an entry into this program as possible.

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So, one thing that we've also talked about a number of times and it's required in the 5/22 – the May 22 waiver, is that we develop policies and procedures for all of these new activities that we're encountering. You should have policies and procedures for your regular activities as well.

But we want to make sure that we are documenting all of these things so that if, when we're monitored, we can have a documentation to show why we did the things we did. I think of policies and procedures sort of as a who, what, when, where, why and how. You're – the policy part is your what, your why and your when, and then your procedures explain the who and the how.

So we have a sample here of a 52-week waiver implementation and the what is: this policy will allow project sponsors to provide STRMU for up to 52 weeks and a 52-week period. And why is: to provide ongoing STRMU assistance for individual households who need additional support beyond the 21 weeks. And the when is: when this takes place. The policy is in effect from the 5/22/20 waiver through 5/21/21.

Now, obviously, if you haven't notified your field office, until today, that you want to make use of this 52-week waiver, your period of performance is going to be a little bit different. So it would be you know, 8/21/2020 to 5/21/2021. And then the procedures. This is all made up -that's why it says Sample.

The procedures, your case managers will, and then the how. They're going to document the COVID related impact on the community that's causing the client's need for longer STRMU assistance, and you're going to put that documentation in the client file, that tells them exactly what they need to be doing and where they need to be housing it, right? And then a copy of this policy needs to be kept in the client file for the purpose of monitoring. That could – that's an individual grantee decision. You could have a copy of the policy someplace else that you're showing it for the purpose of monitoring, but again, this is a sample.

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Additionally, with the policies and procedures, you should outline your efforts to regularly assess the needs of assisted households. So further down there in the how it could say every two months, we're going to reassess these households. You want to define the processes for granting extensions based on the documented financial needs and/or health and safety concerns.

So if you're moving someone from the 21 weeks STRMU to a Waiver or the CARES Act, you'll want to document that. You want to include criteria by which an agency will determine which source of HOPWA funds will be used for individual households and when.

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

You need to just make sure that folks can follow the money, just like you do with your regular policies and procedures.

SLIDE 47

So, now we're on to some STRMU questions and answers that we have received for HOPWA grantees and project sponsors.

SLIDE 48

All right, this one is a bomb dropper. This one is new information. So the question came in, "Can PHP, (Permanent Housing Placement) and STRMU be used together as a strategy to get and keep people housed when they're being impacted by COVID-19?"

Specifically, can we place a household in a unit using PHP for first month's rent and deposit and then use STRMU to pay their rent for a period of time to keep them stable?" And normally the answer is no.

But, since it's unprecedented times, the Office of HIV/AIDS Housing is going to temporarily allow this combination of Permanent Housing Placement and STRMU under specific circumstances during this pandemic crisis in order to quickly house HOPWA eligible households impacted by COVID and ensure that they remain stable for a reasonable period of time.

So in order to implement this PHP and STRMU combo as a HOPWA Housing strategy, it has to be linked to the CARES Act requirements to prepare for, prevent, or respond to COVID-19, so the following requirements have to be met: 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 employment or other benefits, or similar circumstances tied to the impact of COVID-19 in your community.

And at least one of the HOPWA activities utilized, either the PHP or the STRMU, must be funded using CARES Act funds.

And finally, the grantee needs to develop policies and procedures for the approved use of combining PHP and STRMU, including a requirement to provide ongoing case management to monitor stability and provide housing planning for these households while they're assisted and to plan alternatives when the CARES Act funding is depleted.

SLIDE 49

So some STRMU clarifications - Reminders on STRMU limitations. STRMU, funded either through HOPWA – regular HOPWA or CARES Act may not be used to assist households receiving HOPWA TBRA, Section 8 or any other long-term rental assistance during the same period. This includes scenarios in which the household fell behind on their rent portion or their utility payments. You'll need to use other non-HOPWA funds to assist with these arrearages.

So note that only one overlap of funding is allowed - TBRA or STRMU recipients can receive hotel/motel vouchers to allow for isolation for one or more members while they're actively receiving TBRA or STRMU rental assistance.

So again, you may not use STRMU to pay for arrearages in other supported housing.

SLIDE 50

Another question, when providing STRMU assistance using the CARES Act supplemental funding, is there a requirement to capture how COVID-19 is impacting the client for approving assistance?

The answer is it's not required to document a specific COVID-19 impact on each assisted household, such as documenting positive virus test, or that they were laid off specifically due to COVID. However, you should include in your

assessment or your case notes, any direct impacts such as these if they're available, and you should also refer to the general impact of COVID-19 in your community such as increased unemployment, safety concerns, increased housing costs, et cetera, that may have impacted the household.

Remember again, CARES funds must be used to prevent, prepare for, and respond to COVID-19.

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Another question, “Does the 52-week rule for STRMU come into play at all with CARES Act funded STRMU?”

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 a client could receive.

So 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 under the CARES Act without regards to the regular program’s eligibility period.

SLIDE 52

So regarding STRMU and the Waiver option, “If we're delivering STRMU through our regular HOPWA awards and have opted to utilize the waiver to extend some households beyond the 21 weeks up to 52 weeks, what do we need to do differently?”

Well, generally your program can continue as it is with the following additions when using the waiver to extend STRMU assistance. The first thing you need to do actually, and it's unwritten here, is you need to notify your field office that you're utilizing that waiver and then wait two days. Then you need to make sure that you have established written policies and procedures outlining how extensions are granted on a per household basis, and requiring regular reassessments of the needs of those assisted households.

And then you need to also document your good faith efforts to assist the household within that normal 21-week period. So you want to you know, keep going like you normally do and try to find them some alternative to the STRMU assistance.

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So related to CARES Act STRMU and FY20 designated funds, “If we're delivering STRMU through CARES Act and FY20 funds, what do we need to do differently?”

Well, STRMU funded with CARES Act or FY20 have to follow the basic STRMU rules, but it's again, not tied to the eligibility periods or time limits of your regular STRMU program. You also need to make sure that you have written policies and procedures outlining the process through which clients are selected, how the need will be demonstrated - and the requirements to regularly reassess the needs of those assisted households.

You have to document the good faith efforts again to assist those households within that normal 21-week or 52-week limit if applicable, and reasons why additional time is needed. And then you have to ensure that your FY2020 designated funds are not used until CARES Act funds are depleted.

SLIDE 54

Some reminders. Make sure the program is set up and described as supplemental STRMU assistance needed to prevent, prepare for, and respond to COVID-19. Be sure to think of your STRMU program as ONE PROGRAM and how it is presented to the clients and to the public. They don't really need to know how the sausage is being made. Make decisions about the amount of STRMU assistance given to households on an incremental basis, not all up at front.

So if I were to come to you, don't say, Kate, you're going to get eight weeks because I might need more. So when you're doing my reassessments, you will

be able to make those determinations incrementally about how much assistance I might need.

And let your program goals and your community needs guide your STRMU response. Keep your STRMU policies or procedures simple but know what the funding rules are. And be sure to stay safe.

SLIDE 55

Also, we want you to stay informed. So 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. So if you haven't subscribed, please do. You would need to go to that link and follow these directions.

Also, you will find updates on HOPWA guidance for COVID-19 on the HUD Exchange and HUD.gov. You can also Google up HOPWA COVID-19 and it will take you right there.

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And then we have included some resources including a link to that page I just mentioned. There is also Mega Waivers one and two, information about your CPD director contact if you still haven't notified them about what waivers you might use, information about your funding amount if you are not aware of that yet, the HOPWA notice that tells you how to operationalize things. And then importantly for your fiscal folks, your IDIS set up and draw instructions for CARES Act grants.

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We also have some additional resources from the National Low-Income Housing Coalition. They have a rental assistance database that is from across the country and will tell you community by community what's available.

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Again, as we say this at every webinar, but we want to help you get your answers and get the assistance that you need. So if you have questions that come up after this webinar, and you go, oh, I want to ask this question. Go to

the HOPWA Ask a Question Portal and the happy AAQ staff will respond to you as quickly as they can.

Also technical assistance, HUD is making technical assistance available to grantees to support your COVID-19 planning program development and problem solving. So if you are a grantee and you need TA assistance in managing your COVID-19 response, or program issues, you can submit an online request through the HUD Exchange.

SLIDE 59

We have some more upcoming webinars that are going to be next Wednesday, we're going to talk about Remote Methods. And then the week after, we're going to talk about Supportive Services. Those will not be Crystal and I. So you'll get a break from us. And then we have some time to take some questions. So Christine or Emily, do we have questions?

SLIDE 60

Christine Campbell: Yes, we do have a few questions and a lot of them are around moving clients from regular STRMU to COVID STRMU. So, we have one question is, so if a client does not utilize the 21 weeks, but has met the established cap, do we remove the cap first via notification – to the field office? Or we do we move them to COVID money?

Crystal Pope: I saw that question that's really interesting. So it makes most sense, I think to remove the cap if that can be done quickly and easily because the cap is just going to get in the way of your flexibility and moving people back and forth.

But to be clear, you can certainly if you need to do it more quickly, you can switch them to CARES Act funding. If you have that available, you can definitely switch them. There would not be any problem with doing that because that – anytime that they get or money that they get through regular HOPWA STRMU does not count against what they get under CARES Act.

Christine Campbell: Thanks.

Emily Fischbein: Hi, Kate and Crystal, we've had a couple of questions, and I – about waivers and CARES Act. If you could just clarify for folks that the CARES Act is

different from the provisions in the waivers that require submittal to the field office.

Kate Briddell: Go ahead.

Crystal Pope: Kate, you want that or you want me to?

Kate Briddell: No, go right ahead.

Crystal Pope: So the CARES Act is actually, implemented some things for HOPWA which are described in the Notice. I know that's – but – so if you go to the Notice, it will explain what's in the CARES Act related to HOPWA. And it was the CARES Act that allowed you to go up to 24 months of STRMU, I mean that is one of the major parts of the CARES Act.

The waivers are temporary changes that are being allowed in things that are regulatory, like the 21 weeks in 52-week period for STRMU is a regulatory thing. And so HUD has to issue a waiver of that to allow you to go up to, in this case, 52 weeks if you use that waiver. Other waivers include, you know, going above the FMR, some things about requirements for inspections and so forth. Those are all things that are regulatory and the waiver, for a specific set period of time, allows you to do things differently.

Emily Fischbein: Great, thank you. Christine.

Christine Campbell: Sure. So, can you elaborate on the requirement - on what the requirements are in terms of demonstrating a COVID-19 related need in order to use the CARES Act fund? For instance, do you need to demonstrate loss of income due to COVID or are we able to interpret this more loosely?

Crystal Pope: Now, I, you know, I saw that too, and I think that we'll be putting out more information that will help you with that. The – you do have to document what's happening with people, and for the STRMU Program, you know, loss of income is a big deal. And it is and is what brings many people, you know, in. And so even under normal circumstances, and so, you know, so many people have lost jobs because of economic changes due to COVID-19. And I

would say document those things, but it does not, and certainly, Amy, if you're on and want to add anything to this, definitely do.

It doesn't mean that you would have to get a letter, for instance, from the employer saying yes, the reason this person lost its job was due to COVID-19. Not to that documentation level. But you do need to show in your assessment that there is a COVID-19 impact.

Emily Fischbein: We've had a couple of questions around inspections. So could you speak to the need for inspections of housing quality or habitability for STRMU?

Kate Briddell: Well, the STRMU program does not generally require you to do inspections. You are going to want to use your judgment, but it doesn't speak to housing quality standards inspections until after 100 days of continuous support.

And also lead-based paint is the same. You need to make sure that you're taking into a lead – not supporting a unit where it wouldn't pass lead-based paint inspections, particularly if there's a pregnant person or a child under the age of six. You don't have to do lead-based paint inspections if it's an adult in a studio. Crystal, did you want to add anything to that?

Crystal Pope: Yes, I think, as I mentioned earlier because we're potentially providing longer term STRMU, it becomes more important to at least check in on the state of housing and you know that we've never – that HUD has ever required an actual housing inspection in order to provide STRMU, but still the underlying idea is that you won't want to continue to support people in housing that's substandard.

So, you know, the suggestion is really, that as this goes forward, longer term assistance - maybe that needs to be better defined -that at least you use some of the virtual methods at some point to check in on the status of their housing.

And we will definitely make sure that there's more information coming out about that. And some of the other things that people are asking. We will be posting a lot of this including a Q&A, some Q&A documents, and we will try to touch on everything that people have put on here, the ones that we don't get to today, on the HUD Exchange, plus, don't forget the AAQ.

Amy Palilonis: This is Amy, I just want to add that the STRMU guide that's available on the HUD Exchange has information regarding the requirements around lead-based paint and providing STRMU. So I would definitely check those out.

Christine Campbell: Thanks Amy.

So now we're getting into some questions that might be rather situation specific but may have some general applicability. One question is, are there looser guidelines on the legal right to live at a residence? Thinking of folks who have verbal rental agreements or undocumented clients who don't always have a legal lease?

Crystal Pope: Yes, normally. Normally they would have to have a valid lease in place. And it's – I hesitate to answer this one, absolutely, because it is so situational. And it could be, you know, that the lease has renewed on a month to month basis, or it may just be a verbal lease, which may or may not be OK.

I think the idea is and HUD folks, I mean, feel free to weigh in, is you want as much flexibility here as possible in order to make sure that people don't become homeless during this pandemic, but you also - glad that someone asked the question because you have to be careful about also following what the program rules are.

Amy Palilonis: Yes, this is Amy, I would say generally that we say that a lease is required - one that is in sort of is consistent with state and local practices around leases. But if you have a specific client or a specific situation that you would like to ask about, I would definitely submit that through the Ask a Question portal.

Christine Campbell: Thanks Amy.

Crystal Pope: And I, you know, I will say, I know that people hesitate to do that sometimes, but we get a lot of case scenarios coming in, and, that have led to HUD making some new decisions about things. And also if you get some input that way, you have something in writing that says, hey, you know, it- this was the right thing to do at this time that you can put in the record, and kind of cover yourself. So, so please feel free to do that.

Emily Fischbein: Crystal and Kate, we have a question that just is the new guidance that you mentioned today. And the question is, forgive me if I am mistaken, but can we take homeless folks and house them with STRMU? I had thought we could only help if they were already housed and would have to use TBRA for the homeless population.

Kate Briddell: Yes, STRMU continues to be used – need to be used for people who are already housed. The exception that we mentioned today in that question and answer slide was about PHP and STRMU, so helping a client get into housing using the Permanent Housing Placement funds, and then using the STRMU in a very short term capacity to help clients stay housed.

For a person who is living homeless, you can't use STRMU because they're not currently housed. But you could get them in using PHP and possibly transition them to TBRA if that's more appropriate. Again, that's why those assessments are so important as you want to make sure that the client is capable of maintaining things once that assistance is ended.

Emily Fischbein: Thank you.

Christine Campbell: We have a question, Crystal and I know you've talked a little bit about it, but just for clarification about the sequencing of use of funds. So if regular HOPWA and HOPWA/CARES and HOPWA regular with flexibilities can be used at the same time - how does that work if you're stating that HOPWA/CARES must be utilized before HOPWA 20 is expended?

Crystal Pope: Well, the effort – the HOPWA 20, only in this case refers to any FY20 funds that were specifically designated for COVID-19 response. OK, so it's not just any of your regular funds. And the only sequencing that's required is that you must expend your CARES Act funds before you use those designated FY20 COVID-19 funds.

Christine Campbell: Thanks Crystal.

Kate Briddell: So we had a follow up question around documenting COVID related need and we don't want anyone to necessarily hold up how they're providing assistance and so it does not have to be documented income loss.

As we said before, if it is something that, you know, there are other expenses that have taken precedence because you need to buy supplies to get your kid ready for your remote schooling or other documentation, sorry, other documented challenges that are either community or household specific, you just need to make sure that you're documenting that and that is what's making it impossible for someone to pay their rent, or mortgage or utilities.

Emily Fischbein: Thanks, Kate. I'm sorry, I was having technical difficulties a moment ago. Here's a question, again about PHP. And the question is we have observed an increase in domestic violence with families. And I'm wondering if there will be a possible waiver to help these families with a deposit or first month's rent rather than PHP to assist with these types of moves. Is there a possibility of it being considered with domestic violence issues? This has increased since COVID-19.

Crystal Pope: I'm not sure I'm understanding that because you could use PHP funds, but they're talking about using other funds.

Emily Fischbein: I think they're asking if they can use other funds, except that, yes, they could use PHP funds. So I think they're wondering if there might be a waiver for other funds to be used for this. Maybe they haven't budgeted for PHP. I'm not sure what the exact situation is.

Crystal Pope: So I – unless Amy has anything to add to that, I would say that is something to definitely put into the AAQ and provide and, you know, all the detail and context for the question. And let us definitely answer it that way.

Amy Palilonis: Right. But generally, I would just say that PHP is the line item that you would use to do the security deposits and costs to get people into housing.

Emily Fischbein: Great, thank you.

Christine Campbell: So this person is kind of an overlap from our last webinar that still has the connection to this one. Can you comment on self-attestation (inaudible) income during COVID when it comes to determining eligibility for services such as PHP or STRMU?

Kate Briddell: I'm sorry, I did not follow you. Can you read that again?

Christine Campbell: Can you comment on self-attesting of income during COVID when it comes to determining eligibility for services, such as PHP or STRMU?

Kate Briddell: Thank you very much for rereading that. I was for some reason not following you. That is a Waiver that would be - a grantee would need to indicate to their field office that they would be wanting to provide that regulatory waiver.

Again, I believe that was the April waiver, and you would send – a grantee would need to send something to the field office about their desire to utilize that waiver, then they would need to wait two days before they implemented it. And they would need to include – develop some policies and procedures documents for how they're going to use self-attestation for income, and what that timeframe is for utilizing that. But that is legitimate, provided your grantee has invoked that waiver.

Crystal Pope: And what we have heard is that most – that many grantees have already responded to their field offices, right? And have just said that they will make use of all the waivers. And it's, so if you're a project sponsor, definitely you need to check with your grantee about that.

But the whole idea about self-attestation of income, you know, it's waiving the immediate documentation requirements that are needed for entry into the program to determine someone's income. And so with COVID-19 lockdowns and difficulty in getting information, you know, for that we would say, if you – if – first you start with trying to get that documentation because many government offices and banks, everything are open or available to get information, but if they're not and you cannot get the kind of hard copy documentation you would normally get, you are able to let the client attest to what their current income is.

You can follow that up later with, you know, trying to – and there's some requirements about it, to get information about income, but all of those waivers on things like that, were set up to help fast-track assistance and not get mired down in, you know, not being able to receive that kind of documentation from people.

Emily Fischbein: If we have time for one more question, we need some clarification on the difference between FY2020 funds designated for COVID and regular FY2020 funds and CARES funds. The question is, I'm confused on the statement must ensure that FY2020 designated funds are not used until available CARES Act funds are depleted. Do we have to use CARES STRMU before using regular STRMU?

Crystal Pope: No, you did not have to use CARES Act before regular STRMU. So let's say it again, you know, your regular STRMU can be funded by any of your funding streams, including FY20. But grantees have had the opportunity to put in a substantial amendment setting aside a certain portion of their FY20 funding specifically for COVID-19 response.

So, that is – only that designated amount that's in their amendment to their annual action plan -that's what you cannot use until the CARES Act funds are depleted. And those - if a community has set aside those funds, they work by the very same rules, as you see under the CARES Act. It allows up to 24 months of STRMU. It, you know, it's – it has the higher level of admin that comes with it, all of those kinds of things.

So not every community is doing that. So I would direct, you know, you back or anybody back to their grantee. And for grantees that have any question about that at all, let us know.

Christine Campbell: Just to reiterate, it's your CARES Act funny – CARES Act funding, then you're - the money you've set aside from your FY2020 funds.

Crystal Pope: Correct. And in the entire time that you're doing that you can you can be spending your regular STRMU allocations as well.

Amy Palilonis: And when we're talking about FY20 designated funds, that's only – we're only talking about formula funds.

Crystal Pope: Thank you that - forgot that designation.

Kate Briddell: Good clarification. Well, thank you, Christine, and Emily for helping us along with those questions. We are now at time. So I want to thank everyone for joining us today. And I would like to make sure that you are – encourage you all to stay well, practice that hand washing, and we look forward to working with you in the future.

This concludes today's webinar. And we will be emailing the document mentioned previously and these slides in the near future. Thanks, everyone.

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