

HOPWA/COVID-19: STRMU FUNDING OPTIONS

HOPWA/COVID-19: STRMU PROGRAM CATEGORIES

Short-Term Rent Mortgage & Utility (STRMU) assistance provided by HOPWA grantees and Project Sponsors during the COVID-19 pandemic may be categorized in up to three possible ways, depending upon available HOPWA allocations, use of the 5/22/2020 waiver option, use of CARES Act funds and the specific designation of FY20 funds for COVID-19 activities.

1 - STRMU funded by: Regular HOPWA Allocations	2 - STRMU funded by: Regular HOPWA Allocations – Using the 5/22/20 Waiver option	3 - STRMU funded by: CARES Act and by FY20 \$ designated for COVID-19
Eligible Households may receive: Up to 21 weeks of assistance in a 12-month 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

The three categories of STRMU shown in the chart above vary based on funding source(s), level of assistance that may be provided, and time limitations, as explained below:

- STRMU funded by regular HOPWA allocations.** This represents an existing STRMU program (or new STRMU program) funded through regular HOPWA allocations. In this STRMU category, a client may receive up to 21 weeks of assistance with rent, utilities and/or mortgage payments accrued within a 12-month (52-week) eligibility period established by the grantee.
- Regular HOPWA STRMU + 5/22/2020 waiver option.** This represents the same existing (or new) STRMU program shown in #1, in which the grantee is utilizing the 5/22/20 waiver option. In this STRMU category, selected households may be approved to receive up to 12 months of assistance within the 12-month eligibility period. The increase from a 21-week limit to a 52-week limit must be decided on an individual household basis.
- STRMU funded by CARES Act and/or FY20 funds designated for COVID-19 response.** This represents an extended STRMU option made available through the CARES Act that is also applicable to FY20 set-aside funds. Households receiving this category of STRMU may receive up to 24 months (2 years) of STRMU assistance.

STRMU Waiver Option: 5/22/2020 Mega Waiver

On an individual household basis, grantees or project sponsors may assist eligible households for a period that exceeds the time limits specified in the regulations. STRMU payments to prevent the homelessness of the tenant or mortgagor of a dwelling may be provided for costs accruing up to 52 weeks in a 52-week period.

Requires: Field Office notification, specific documentation requirements and written policies & procedures to address ongoing assessment of needs.

[5/22/2020 Mega Waiver](#)

HOPWA/COVID-19 STRMU PROGRAM OPERATIONS AND RULES – Categories 1 and 2

STRMU provided using regular HOPWA allocations (not part of the FY20 COVID set-aside) will follow normal STRMU operational guidelines. However, if grantees opt to utilize the 5/22/20 waiver option, they will need to develop clear policies and procedures for use of the waiver to extend STRMU on a household basis.

1 - STRMU funded by: Regular HOPWA Allocations	2 - STRMU funded by: Regular HOPWA Allocations – Using the 5/22/20 Waiver option
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

1. STRMU FUNDED BY REGULAR HOPWA ALLOCATIONS:

- **Eligibility:** HIV diagnosis for at least 1 household member; household income at or below 80% AMI (or lower level based on local program policies); household has legal residency in housing; and demonstrated need.
- **Suitable housing unit:** HQS inspection not required initially for use of time-limited STRMU, however HUD recommends that HOPWA-supported housing with continued occupancy meets HOPWA habitability standards. Lead-based paint: units assisted over 100 days must comply with lead-based paint requirement.
- **Eligible STRMU period:** 52-week eligibility period, begin/end dates as established locally.
- **Amount of assistance:** Up to 21-weeks of rent, mortgage and/or utility assistance, based on needs assessment and housing plan.
- **Caps:** May be established locally to address additional time and/or dollar limits.
- **Documentation:** All normal documentation as outlined in the [HOPWA STRMU Guide](#)

2. STRMU FUNDED BY REGULAR HOPWA ALLOCATIONS AND USING THE 5/22/20 WAIVER OPTION:

- **Basic Eligibility:** HIV diagnosis for at least 1 household member; household income at or below 80% AMI (or lower level based on local program policies); household has legal residency in housing; and demonstrated need.
- **Additional Eligibility:** Demonstrated need for assistance beyond 21 weeks, based on policies and procedures in place for use of the 5/22/20 STRMU waiver. The procedures should outline processes for granting extensions based on documented financial needs and/or health and safety concerns.
- **Suitable housing unit:** HQS inspection not required initially for use of time-limited STRMU, however HUD recommends that HOPWA-supported housing with continued occupancy meets HOPWA habitability standards. Lead-based paint: units assisted over 100 days must comply with lead-based paint requirement.
- **Eligible STRMU period:** 52-week eligibility period should coincide with normal (non-waiver) STRMU program period, begin/end dates as established locally.
- **Amount of assistance:** Up to 52-weeks of rent, mortgage and/or utility assistance, based on needs assessment and housing plan. The use of the waiver can be initiated anytime between 5/22/20 and 5/21/21 and associated assistance may continue up to 52 weeks from initiation.

- **Caps:** May be established locally to address time limits above 21 weeks but less than 52 weeks and any dollar limits.
- **Documentation:** Waiver requirements: Must show good faith efforts to assist the household to achieve permanent housing stability within the 21-week limit but that financial needs and/or health and safety concerns have prevented the household from doing so.
- **Policies & Procedures:** Waiver requirements: Grantees/Sponsors must have written policies & procedures outlining efforts to regularly reassess the needs of assisted households and processes for granting extensions based on documented financial needs and/or health and safety concerns. Procedures should also guide how programs will consistently ensure that units are not substandard.

HOPWA/COVID-19 STRMU PROGRAM OPERATIONS AND RULES – Category 3 (CARES and FY20)

STRMU provided using CARES Act funding or FY20 formula HOPWA funds approved under a grantee’s Annual Action Plan (AAP) for allowable activities to prevent, prepare for and respond to the COVID-9 pandemic must establish operational guidelines consistent with CARES Act requirements as outlined in Notice CPD-20-05.

STRMU funded by: CARES Act and by FY20 \$ designated for COVID-19
Eligible Households may receive: Up to 24 months of assistance

3. STRMU FUNDED BY CARES ACT OR FY20 FORMULA HOPWA FUNDS DESIGNATED FOR COVID-19 RESPONSE:

- **Basic Eligibility:** HIV diagnosis for at least 1 household member; household income at or below 80% AMI (or lower level based on local program policies); household has legal residency in housing; and demonstrated need.
- **Additional Eligibility:** Demonstrated need for an extended period of assistance based on policies and procedures in place for CARES Act STRMU.
- **Suitable housing unit:** HQS inspection not required initially for use of time-limited STRMU, however HUD recommends that HOPWA-supported housing with continued occupancy meets HOPWA habitability standards. Lead-based paint: units assisted over 100 days must comply with lead-based paint requirement.
- **Eligible STRMU period:** There is no eligibility period applied to this category of STRMU (such as the 12-month eligibility period per client under regular STRMU). There may be other limitations to how long a household can receive assistance based on funding available, local policies and the federal end date for expenditure of CARES funding.
- **Amount of assistance:** Up to 24 months of rent, mortgage and/or utility assistance, based on initial and ongoing needs assessments and housing plans.
- **FY 20 Limitation:** FY20 funds designated in the AAP for COVID-19 may NOT be spent until all CARES Act funds have been depleted.
- **Caps:** May be established locally to address time limits up to 24 months and any dollar limits.
- **Documentation:** Must show good faith effort to assist the household to achieve permanent housing within the 21-week (or 52-week) limit but that financial needs and/or health and safety concerns have prevented the household from doing so.

- **Policies & Procedures:** Grantees/Sponsors must have written policies & procedures outlining efforts to regularly reassess the needs of assisted households and processes for granting extensions based on documented financial needs and/or health and safety concerns.

CARES Act STRMU Provisions: Notice CPD-20-05

The CARES Act provides that the supplemental grant funding may be used to provide STRMU payments to prevent homelessness of a tenant or mortgagor of a dwelling for a period of up to 24 months. The 24-month limit on STRMU assistance specified by the CARES Act is only applicable to funds received under the CARES Act and any portion of a grantee’s FY 2020 formula funds that have been approved under its AAP for allowable activities to prevent, prepare for, and respond to the COVID-19 pandemic. STRMU assistance provided under all other HOPWA awards remains subject to 42 U.S.C. 12907(b)(3)(B), which limits STRMU to a period of no more than 21 weeks of any 52-week period.

[Notice CPD-20-05](#)

Primary Sources for HOPWA/COVID-19 Information

Mega-Waiver 1 4/1/2020	Notice CPD-20-05 5/8/2020	Mega-Waiver 2 5/22/2020	HOPWA Program Flexibility 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>

This resource is prepared by technical assistance providers and intended to help Grantees and Project Sponsors understand guidance related to the HOPWA Program and COVID-19. The contents of this document, except when based on statutory or regulatory authority or law, do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.