



HOPWA/COVID-19: A Review of Current Questions and Answers for HOPWA Grantees and Sponsors

Q&A Webinar 2

May 6, 2020



Presenters

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Webinar Objectives

- Provide an update of frequently asked questions from HOPWA grantees and sponsors in response to COVID-19-related waivers and the CARES Act
- Provide some additional guidance on how to operationalize waiver and CARES Act provisions
- Identify where webinar participants can go for additional information and assistance
- Answer questions



HOPWA/COVID19 Webinar

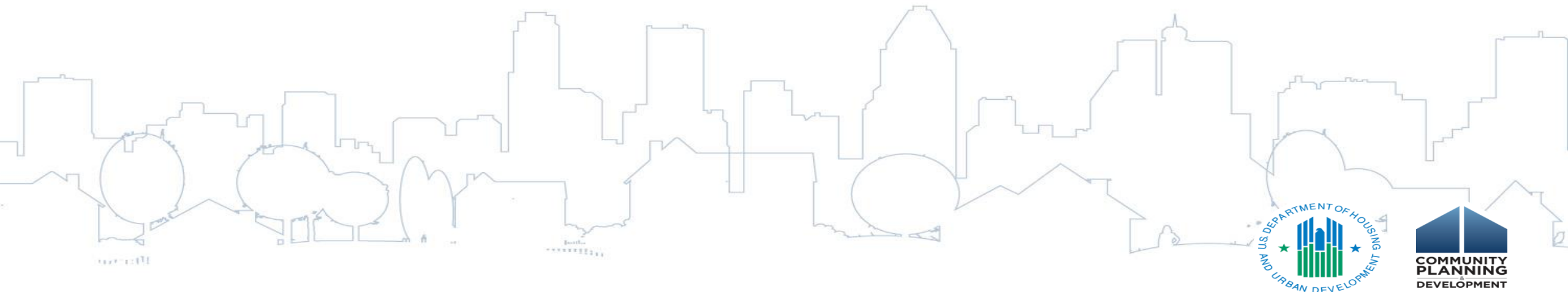
Reminders

- 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](#)



Planning for Use of CARES Act Funds

The CARES Act funding is intended to be flexible to help you respond to the needs in your community. You will need to determine both immediate needs and anticipated needs when planning for CARES Act funding.

To begin your planning:

- Consider the emerging needs of your **current clients** and anticipate that more needs will emerge from PLWH who are not currently needing services.
- Determine **what is already available** from other resources in your communities, such as food banks or Ryan White services.
- Consider **new resources** that are available like FEMA, other HUD programs, or other local COVID-response sources.
- **You will need this information to fill in the budget forms required to execute your grant agreements.**



Planning for Use of CARES Act Funds

Q: Is there guidance on how communities should proceed with allocation of the CARES Act funds?

Consider your HOPWA allocation(s) and the total amount of CARES Act funding received together with your highest priority needs and address such questions as:

1. Are there new activities needed that we can add to our existing awards? Things we are not currently funding, like hotel/motel vouchers, supportive services/nutrition, etc.
2. What priority activities cannot be covered or fully funded through our existing awards?
3. Can any of these be covered by other funding sources, such as Ryan White?
4. CARES Act funds are time-limited, so what is most needed right now?
5. How can we hit the right “balance” between the use of our HOPWA allocations and the use of CARES Act funds? Remember that both will operate simultaneously.



Specific Steps for Formula Grantees

1. In order to use the CARES Act funding, you must **amend your Annual Action Plan** and you may have to amend your Consolidated Plan to accommodate the **new funds** in the community.
 - Required attachments: SF-424, SF-424D, the certifications at 24 CFR 91.225(a) and (e) or 24 CFR 91.325(a) and (e)
2. New **2020** Projects must be created solely for HOPWA CARES Act funding (even if amending 2019 AAP).
3. Project descriptions should include budget and proposed household count by eligible activity.
4. If you are planning to add new activities with your CARES Act funding, you must do so during this amendment process.
5. If you are planning to exercise any waivers listed in the **Memorandum** issued April 1, 2020, **including the Con Plan waivers**, you must inform your Field Office's CPD Director, per the instructions in the Memorandum.
6. Wait 2 days before implementing waiver provisions.



Specific Steps for Competitive Grantees

1. Submit a brief description to your respective Field Office of planned uses for the supplemental grant funds.
 - a. The description should be one or two pages long and should include:
 - i. A list the type and amount of each eligible activity the grantee anticipates undertaking with the funding
 - ii. A description of the process that will take place to carry out the work quickly
 - iii. A description of how eligible households will access the assistance during any period of time the grantee's main operations are closed due to public health official guidance.
2. Each grantee must also include a completed HOPWA budget **form HUD-40110-B** and completed forms **SF-424, SF-424B, and SF-424D** in its submission.
3. Grantees are also encouraged to provide a description of any identified immediate technical assistance needs.



Competitive Grantees

Q: Please clarify how a Competitive grantee may spend CARES Act funds. May we use these funds to provide any HOPWA activities even if they are outside of the normal scope of Permanent Supportive Housing categories? Does this require a waiver/amendment to our contracts?

A: Yes, you may spend the CARES Act funds for activities that are outside of the normal scope of the Permanent Supportive Housing categories included in your contracts. You should:

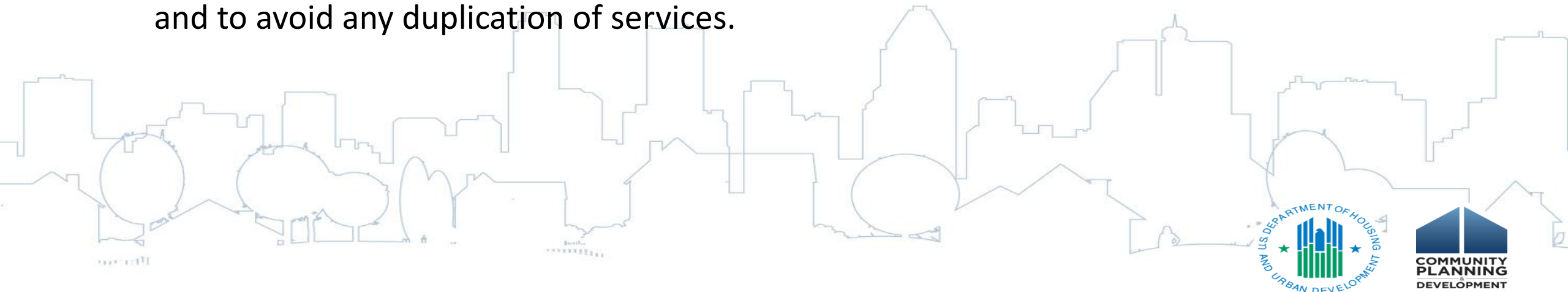
- Continue to carry out the normal activities outlined in your HOPWA contract
- Plan and budget for the use of supplemental CARES Act funds you will receive – may be used for any HOPWA-eligible activity or specific activities described in the CARES Act
- Follow the HUD process to complete forms and provide activity descriptions for use of the CARES Act money to your HUD FO



Competitive Grantees

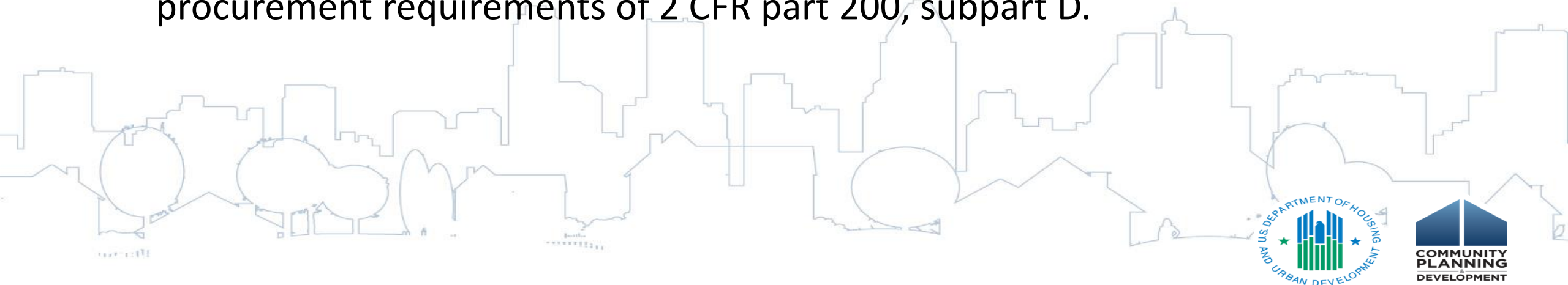
Q: As a competitive-HOPWA grantee, should we serve clients not currently in our program with CARES Funding, or can we serve additional clients. What area(s) can we serve?

A: Competitive-HOPWA grantees may serve any HOPWA-eligible clients in their area and are not limited to current clients. Grantees must work closely with the Formula HOPWA grantees and other programs in their area to coordinate program responses and to avoid any duplication of services.



CARES Act: Contract Time Requirements

- The purpose of the CARES Act funding is to meet the immediate needs of HOPWA-eligible individuals and families affected by COVID-19.
- Grantees are expected to execute **new or amend existing** project sponsor agreements for the supplemental funds **within fourteen (14) days** of execution of the formula or competitive grant agreements.
- Please be reminded that the selection of project sponsors is not subject to the procurement requirements of 2 CFR part 200, subpart D.



Funding COVID-19 Activities Quickly

Q: If CARES Act funds can be used to reimburse allowable costs, how can we fund those activities now in order to deliver needed housing and services?

A: Formula and Competitive grantees may use a number of methods to immediately fund COVID-19 activities that can be reimbursed and reconciled once the CARES Act funds are received. Some options include:

- **Leveraged Non-Federal funds:** grantees may use general funds or other non-HOPWA resources to pay for COVID-19 activities they are carrying out now that they intend to cover with their CARES Act award, once received
- **Current HOPWA funds/awards:** grantees may use any line item available in their current awards to pay for COVID-19 activities they are carrying out now that they intend to cover with the CARES Act award, once received

NOTE: In order to use these options, grantees **MUST** have clear documentation that the costs are “CARES Act-eligible” and they must be able to show, if monitored later, that the funds have been reconciled.



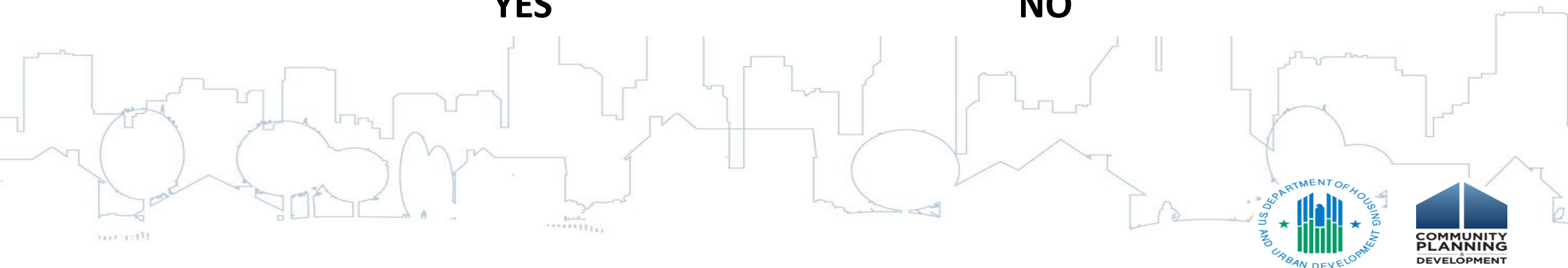
POLL

This poll is open ONLY to HOPWA Formula or Competitive Grantees

Have you already **drawn** from your existing HOPWA funds on your local community's preparation or response to COVID-19 for which you intend to reimburse yourself/ reconcile funds from the CARES Act?

YES

NO



Policies & Procedures – CARES Act and Waiver Activities

- **Grantees** are encouraged to develop Policies and Procedures to document:
 - Any waivers that you have chosen to exercise
 - How you are implementing those waivers
 - The records you will maintain to support the waivers
 - Any new procedures you have implemented in order to work remotely
 - The timeframe that these emergency P&Ps will cover
- You do not need to re-write all of your P&P, rather you can write P&P specific to the COVID-19 Pandemic
- You are strongly encouraged to **share this information with your Project Sponsors** so they know what you are expecting especially as it relates to documentation.



Policies & Procedures – CARES Act and Waiver Activities

- **Project Sponsors** are encouraged to develop Policies and Procedures to document:
 - Any new procedures you have implemented in order to work remotely
 - The documentation they are requiring in client files to implement these new remote or virtual services
 - The timeframe that these emergency P&Ps will cover
- You do not need to re-write all of your P&P, rather you can write P&P specific to the COVID-19 Pandemic.
- *Project sponsors' P&P should be based on their grantee's policies.*



Policies & Procedures – CARES Act and Waiver Activities

Examples of new Policies & Procedures you may need to develop:

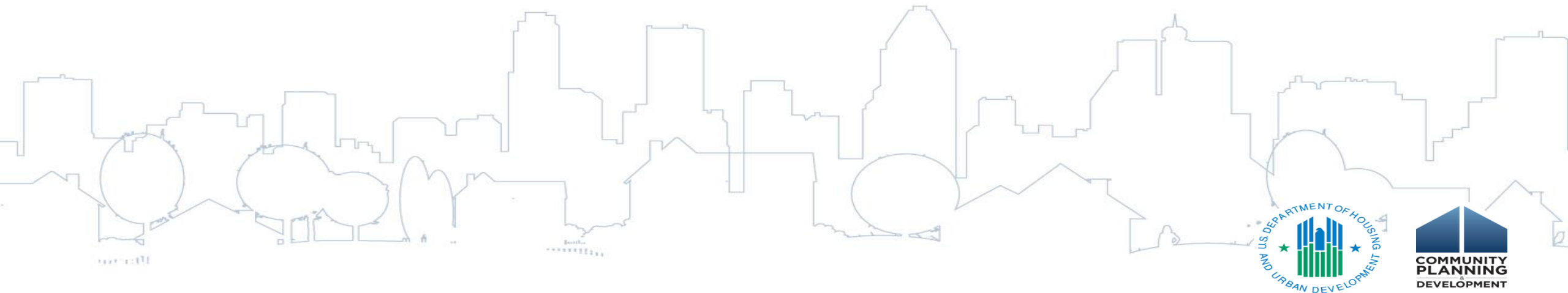
- Any deviation from normal operating procedures, such as:
 - Self-certification of income*
 - Self-certification of HIV status*
 - Waiver of FMR Standard*
 - Virtual housing inspections*
 - Verbal attestations in lieu of signatures
 - Use of supportive service dollars to purchase protective supplies because no other source of funding was available
 - Use of hotel/motel stays for non-HIV positive family members
 - Any extension of the 60 day hotel/motel limit
 - Any new HOPWA activities, i.e. a new STRMU program or hotel/motel vouchers

*Please note that these can only be used if the Grantee has exercised these waivers and communicated this to the Field Office and the Project Sponsors



Q & A Review

Review of recent questions from the HOPWA AAQ
through 5/5/2020.



STRMU Clarifications

Q: How should STRMU be utilized differently when funded through the CARES Act funds? What flexibility do we have in how STRMU is implemented?

A: The only change to STRMU, when delivered using CARES Act funding, is that the normal time limits – no more than 21-weeks in a 52-week period – are extended, **allowing eligible households to receive STRMU for up to 24 months.**

Note that all other STRMU requirements remain unchanged, including:

- Basic program eligibility (HIV status and total HH income at 80% AMI or lower)
- A household must have legal residency in housing and/or be responsible for utility payments
- A household must demonstrate need for the assistance
- Households will have the opportunity to receive case management services



STRMU Clarifications

Possible STRMU Scenarios Through CARES Act Funding

Depending on level of funding vs local needs, grantees may develop a plan and policies for the use of CARES Act STRMU funds such as:

- Cover rent, mortgage and utility payments only after a household has reached 21 weeks of assistance (in 52-week period) from regular HOPWA allocations
- Assistance could be limited to more than 21 weeks but less than the 24 months
- All eligible households (when possible) could be covered for extended STRMU up to the 24 months or a cap set locally; or
- The provision of extended STRMU could be considered on a case by case basis
- Extended rent or mortgage vs utility assistance may be treated differently – can one of these be covered through other local sources?
- Other options as developed locally



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.



Self-Certification of Income and Credible Information on HIV Status

What the waiver addresses:

Waiver Justification: The waiver permits grantees to temporarily bypass the income and HIV status documentation requirements at (24 CFR 574.530 Recordkeeping), allowing the HOPWA-eligible person and family members to self-certify their level of income and allowing acceptance of credible information on HIV status in lieu of source documentation for the purposes of establishing eligibility for HOPWA assistance of families and grantees affected by COVID-19.

Time Period: Grantees/recipients agree to obtain source documentation of HIV status and income eligibility within 3 months of public health officials determining no additional special measures are necessary to prevent the spread of COVID-19.



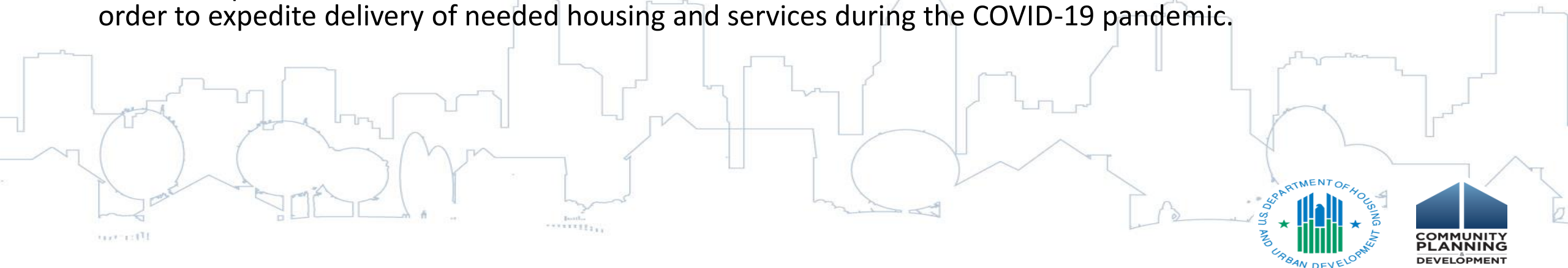
Self-Certification of Income

Q: Does self-certification of income apply only during intake to determine HOPWA program eligibility?

A: No, self-certification of income in lieu of source documentation, when needed, applies to any program delivery activities in which documentation of income is a factor, including:

- Intake and overall HOPWA program eligibility
- Income and rent calculation for TBRA, Master Leasing or Facility-Based Housing
- Annual and interim reassessments for rental assistance

In practice, programs should continue to collect appropriate source documentation for household income whenever possible. When such documentation is unavailable, the waiver allows self-certification of income in order to expedite delivery of needed housing and services during the COVID-19 pandemic.



Self-Certification of HIV Status

Q: How should we utilize the HIV documentation waiver provision? Do we apply it to all applicants?

A: In practice, programs may still be able to obtain appropriate source documentation of HIV status for many potential clients through testing centers or medical facilities, so those options should still be pursued whenever possible.

When source documentation is not attainable or timely, grantees making use of this waiver provision should have policies in place allowing for “other credible information” to be used to document HIV status in lieu of source documentation. These policies should include information about "other credible information" documentation requirements gathered at program entry, required timeline for collecting source documentation after COVID-related restrictions in the community are lifted (3 months), and actions to be taken if HIV status cannot be documented, via source documentation, at that time.



Credible Information on HIV Status

Q: Can you provide examples of credible information on HIV status? What is acceptable?

A: There are several ways a person could provide “credible information on HIV status.”
Some examples include:

- During an intake or in conversation, do they seem to know about things like:
 - HIV medications
 - Doctors in the area who treat HIV
 - Viral suppression
 - Their own status and HIV medical history
- A referral from another HIV-specific agency
- An acknowledgement from a case manager in the same agency who has already worked with the client and knows them to be HIV+



HOPWA Space and Security

HOPWA Space and Security

Waiver justification: This waiver is required to enable grantees and project sponsors operating housing facilities and shared housing arrangements the flexibility to use optional appropriate spaces for quarantine services of eligible households affected by COVID-19. Optional spaces may include the placement of families in a hotel/motel room where family members may be required to utilize the same space not allowing for adequate space and security for themselves and their belongings.

Time Period: can be used to address quarantine space during the allotted quarantined time frame recommended by local health care professionals.



HOPWA Space and Security

Q: Can you provide some examples of how this waiver provision could be used? Why is it needed?

A: The HOPWA Space and Security waiver relaxes a specific regulatory requirements under the General Standards for Eligible Housing Activities: Housing Quality Standards/Habitability (24 CFR 574.310(b)(2)(iii)). The space/security citation states that *“each resident must be afforded adequate space and security for themselves and their belongings. An acceptable place to sleep must be provided for each resident.”*

Utilizing this waiver provision could allow grantees/sponsors to:

- Temporarily house a household in a space that would otherwise be considered too small, such as motel rooms;
- Set up unconventional spaces – like a dining room or other space – within a facility as temporary housing or quarantine space
- Other temporary space situations that do not meet the standards



Purchase of Cell Phones

Q: Will HOPWA allow purchase of cell phones, wireless service plans and/or phone cards for clients?

- Purchase of cell phones, wireless service plans and/or phone cards for clients is allowed when needed to enable provision of **supportive services necessary to obtain and retain housing and ensure client safety and stability**.
- Phones must be **owned by the Project Sponsor**, may be **loaned to clients**, and must be returned to the sponsor when the emergency need no longer exists.
- **Prepaid or “disposable” phones** may be purchased for this purpose, but may only be loaned to clients.
- **Phone cards or minutes** may be purchased for clients who already own a phone when needed to access supportive services necessary to obtain and retain housing and ensure client safety and stability.
- When phones, phone cards or phone minutes are purchased for the purposes described above, the costs may be charged to **HOPWA Supportive Services**.

Note: It may also be possible for sponsors to purchase phones for TBRA programs (charged to TBRA) that can temporarily be loaned to the recipient or a landlord, when needed, to conduct virtual inspections.



Nutrition Services

Q: What types of nutrition services are allowed under CARES Act funding? Can we provide clients with grocery cards? What about meal delivery?

A: Grantees have a great deal of flexibility in the provision of nutrition services for eligible households. Food can be provided in forms such as food banks, groceries, food boxes, and meal or grocery deliveries. Methods used to provide needed food and groceries to households may include the use of grocery-store cards, food delivery by staff or contracting with food delivery services for meals or groceries, food/grocery pick-up sites for clients or other similar methods based on resources and local needs.

Reminders/Cautions: When providing grocery store or other cards to clients for food purchases, put in place methods to restrict purchases to food items or other similar controls whenever possible. Use careful tracking methods for food purchases and think through any policies needed on waste, fraud and abuse.



Transportation Services

Q: What types of transportation services are allowed through CARES Act funding? Can we provide gas cards or similar payment methods for client-owned vehicles?

A: Yes, you may provide transportation services for eligible households, including costs for privately-owned vehicle transportation when needed, to access medical care, supplies, and food or to commute to places of employment. This assistance can take the form of gas cards or similar pre-paid debit cards.

Reminders/Cautions: When providing gas station or other cards to clients for gasoline purchases, put in place methods to restrict purchases to gas or other similar controls whenever possible. Use careful tracking methods for gas purchases and think through any policies needed on waste, fraud and abuse.



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



Resources

HOPWA Guidance for COVID- 19 Webpage on the HUD Exchange

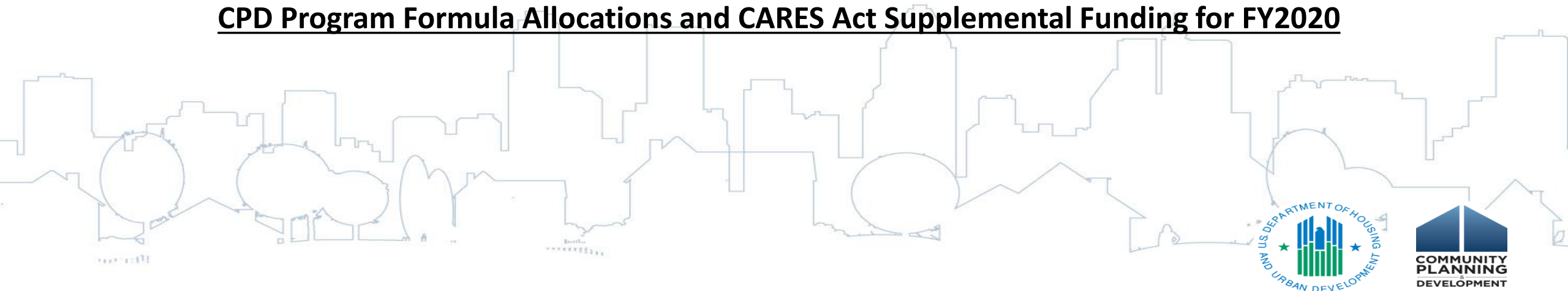
Waiver Memorandum

Available waiver flexibilities and notification process

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



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/>



Questions

