

COLLABORATIVE SOLUTIONS, INC.

**Moderator: Valencia Moss
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OPERATOR: This is Conference #: 401111127

SLIDE 1

Valencia Moss: Hello, everyone. And thank you for joining us for the HOPWA/COVID-19: A Review of Current Questions and Answers for HOPWA Grantees and Sponsors. This is Q&A webinar number two. Today's webinar will be recorded and made available for live on-demand sessions. We will begin promptly in three minutes.

Hello, everyone and thank you for joining us for the HOPWA/COVID-19: A Review of Current Questions and Answers for HOPWA Grantees and Sponsors. Today is Wednesday, May the 6th, 2020. Today's webinar is being recorded and will be made available immediately after today's webinar for listening for those who did not attend this session or would like to review today's session.

Also, if you would like to download a copy of today's PowerPoint, you may do so by locating the link box located in the left-hand corner of your screen. Select number 1 and Open. If you have questions for our presenters today, we ask you to please submit those in the chat box located in the bottom left-hand corner of your screen.

We will also be utilizing our live poll feature in today's webinar. You will be prompted to select either A or B pertaining to the question that's listed on the

screen. Again, we would like to introduce you our presenter, Kate Briddell.
Kate?

Kate Briddell: Hello, everyone, and thank you for joining us today. Collaborative Solutions is pleased to present this webinar, and we're pleased to welcome you all.

Today's speakers are going to be myself, Kate Briddell, Crystal Pope, and Becky Blalock with Collaborative Solutions. On the line also are Rita Harcrow, the Director of the Office of HIV/ AIDS Housing; Ben Ayres, the Deputy Director at OHH; Amy Palilonis, Senior Program Specialist; and Katie Pittenger, the Financial Operations Analyst at OHH. Monitoring the chat box today are Christine Campbell and Emily Fischbein with Collaborative Solutions.

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We wanted to give you some webinar reminders today, specifically about the waivers and program guidance.

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Please be reminded that we – HUD has been issuing a number of waivers and program guidance, and to make sure that you are applying the HUD guidance to the proper program.

The CoC and ESG guidance does not apply to HOPWA. Also, as communities are deciding how to respond to specific COVID- related needs, 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. The project sponsors are reminded to follow plans outlined by their grantees.

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Also, guidance related to funding and implementation of COVID-19 activities is evolving quickly. So as new information and requirements emerge, HOPWA grantees and project sponsors should stay tuned to the HOPWA

Listserv and HOPWA guidance on the COVID-19 page on the HUD Exchange.

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So, Planning for Use of CARES Act Funds. I'm sorry, before we get into that, I just want to actually encourage you again to put questions in the chat box as we go along.

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SLIDE 6

Now, Planning for Use of CARES Act Funds. Sorry. 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 your 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 in your community from other resources, such as food banks, or Ryan White resources, so that you're not unnecessarily duplicating the resources, and consider what new resources are going to be available, like FEMA or other HUD programs like ESG and CoC, or other local COVID response sources. You will need this information to fill out the budget forms required to execute your grant agreement.

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So a question that's come up is: Is there guidance on how communities should proceed with allocations of their CARES Act funds? As I said, consider your HOPWA allocations and your total amount of CARES Act funding you're expected to receive, together with your highest need priority— sorry, your highest priority needs and address such questions as, "Are there new activities that we need to add to our existing awards?"

Things that you're not currently funding like hotel/motel vouchers or supportive services, like food? What priority activities cannot be covered or

fully funded through your existing award? Can any of these be covered by other funding sources like Ryan White?

CARES Act funds are time-limited, so what is most needed right now? And how can we hit the right balance between the use of our HOPWA allocations and the use of our CARES Act funds? Remember, that you're going to be using both of those simultaneously.

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Some specific steps for formula grantees. Number one, in order to use the CARES Act funding, you're going to have to amend your Annual Action Plan and may have to amend your Consolidated Plan to accommodate the new funds in your community. You also are going to be needing to use these particular attachments, your SF-424, your SF-424D, and the certifications at 24 CFR 91.225(a) and (e) and 24 CFR 91.325 (a) and (e).

Number two, new 2020 Projects must be created solely for HOPWA CARES Act funding, even if you're amending your 2019 Annual Action Plan.

Number three, the Project descriptions should include budget and proposed household count by eligible activity.

Number four, if you are planning to add new Activities with your CARES Act funding, you must do so during this amendment process.

Number five, if you are planning to exercise any waivers listed in the memorandum issued April 1st, including Con Plan waivers, you must inform your field office's CPD Director per the instructions in that memorandum.

Number six, you need to wait two days before you implement your waiver provision.

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Specific Steps for Competitive Grantees. Number one, submit a brief description to your respective field office of planned uses for the supplemental funds. The description should be one or two pages long and should include; one, a list of the type and amount of each activity that you are anticipating

using with the funding; two, a description of the process that you will take to carry out the work quickly; three, a description of how eligible households will access the assistance during any period of time that your main operation may be closed due to public health official guidance.

Second thing is that each grantee is going to have to submit a completed budget form, a revised budget form, HUD-40110-B and completed form SF-424, SF-424B and SF-424D in your submission. You should also provide the description of any identified immediate technical assistance needed in order to implement those funds.

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For competitive grantees, we've had a question: Please clarify how a competitive grantee may spend your 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 and does this require an amendment or a waiver to our contracts?

The answer is, yes. You may spend the CARES Act funds for activities that are outside of the normal scope of your permanent supportive housing categories included in your contract. You should carry out the normal activities outlined in your HOPWA contract, plan, and budget for the use of supplemental CARES Act funds you will receive. This may be used for any HOPWA eligible activity or specific activities described in the CARES Act. And follow the HUD process to complete forms and provide activity descriptions for use of the CARES money to your HUD field office.

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Another question from competitive grantees is: As the competitive HOPWA grantee, should we serve clients not currently in our program with CARES funding or can we serve additional clients? What areas can we serve?

So the answer is that you can serve any HOPWA eligible clients in your area and are not limited to just your current clients. If you do that, you need to work closely with the formula HOPWA Grantees and other programs in your area to coordinate program responses and to avoid duplication of services.

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Now, we know that there are some time constraints with these CARES Act funds, so please be reminded that the purpose of the CARES Act funding is to meet 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 14 days of receipt of those funds – sorry, of execution of the grant agreements, formula and competitive.

Please be reminded that the selection of project sponsors for HOPWA programs is not subject to the procurement requirements of 2 CFR Part 200, subpart D. We know that this might be a challenging prospect for you all because contracting and procurement processes might be lengthy in your jurisdiction. But please work with whomever has the authority to fast track contracts in your jurisdiction to ensure that this time limit is met.

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Becky?

Becky Blalock: I'm here thanks, Kate. Funding COVID activities – COVID-19 activities quickly. Question: 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?

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

Current HOPWA funds and 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 their CARES Act award once it is received.

Notes: 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.

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This is the poll that Valencia has spoken of. We would like to know how many grantees, formula or competitive, have already drawn from your existing HOPWA funds on your – in your local community's preparation or response to COVID-19 for which you intend to reimburse yourself/ reconcile funds from the CARES Act.

So if everyone would go – if the formula grantees– competitive grantees would go ahead and take a minute, to respond, to either click yes or no, that will help us get a sense of who's already doing this work and who's going to need some TA as soon as CARES Act funding is available. We'll give you about a minute to respond.

Valencia Moss: All right, we still have a few people responding, so we're going to give you guys a couple of more seconds. As you can see live, the chart is moving, so you guys can see where everyone is standing on the poll.

Becky Blalock: All right, we're going to go ahead and move on, and note that we're still waiting for a few responses. So if you have respond – if you have already drawn your existing funds, but you did not respond as such to this poll today, if you would reach out to us through the AAQ, and we will make sure you get the TA you need.

And as Kate said earlier, we are still working on the guidance and the TA plan to make sure that everyone gets the technical assistance that they need to do the reconciliation process. So when we have that finalized, we will be reaching out to definitely those grantees who have already responded yes. And

we will be checking in with all of the grantees eventually to make sure that everyone has the help they need to make sure that all the processes are followed correctly.

Kate, I think it's back to you.

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Kate Briddell: Great. Thanks, Becky, and thanks everyone for participating in that poll. As Becky said, we want to make sure that we get you the best assistance we can to make sure that this thing goes smoothly.

Speaking of things going smoothly, Policies and Procedures for CARES Act and Waiver Activities. We want to make sure that things go smoothly with that, too. So grantees are encouraged to develop policies and procedures to document any waivers that you've chosen to exercise.

Explain how you are implementing those waivers; describe the records that you will maintain to support those waivers; describe any new procedures that you've implemented in order to work remotely, like - I'll give you some examples in the next coming up slide; and then the timeframe that these emergency or current policies and procedures will cover.

You don't need to rewrite all of your policies and procedures; just have a set that goes on the side that are specific to the COVID-19 pandemic. And you are strongly encouraged to share this information with project sponsors so that they will know what you are expecting, especially as it relates to documentation.

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Project sponsors, you are also encouraged to develop policies and procedures to document any new procedures that you have implemented in order to work remotely, the documentation that you are requiring in client files to implement these new or remote, or virtual services, and the timeframe that your P and Ps will cover.

Again, you don't need to rewrite all of your current policies and procedures. Rather, you can write policies and procedures that are specific to the COVID-

19 pandemic. You can reference your currently written ones to say something along the lines of we are going to change our inspection process in this way. I will also in the next slide, talk more about that.

Please be reminded that you should be basing your policies and procedures as project sponsors off of your grantee's policies, which again grantee, please be sure that you're sharing this information with your project sponsors.

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Some examples of new policies and procedures you may need to develop: any deviation from your normal operating procedures, such as Self-certification of Income, Self-certification of HIV status, a Waiver of your FMR Standard and Virtual housing inspections, or the Security and Space requirements.

Those ones with the asterisks and the one that I just mentioned, are only eligible if your grantee has exercised these waivers, you communicated that to the field office and to the project sponsors. So, again, grantees please be sure you're letting your project sponsors know whether or not you have exercised those waivers.

Others things that you are going to want to document are things like verbal attestation in lieu of live signatures, any use of Supportive Service dollars to purchase protective supplies, because there are no other sources of funding available for those, use of hotel/motel space for non-HIV positive family members, any extension of the 60-day hotel/motel limit, or any new HOPWA activities that you're going to implement, like a new STRMU program or hotel/motel vouchers.

And that's it for me. So Crystal, do you want to take over?

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Crystal Pope: Sure. Thank you, Kate. So, now we're going to review some of the recent questions we've received asking for clarification on some issues and for new information and examples. We hope this will be helpful to you as you're working on designing your COVID-19 responses.

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We've had a number of questions during the last webinar and through the AAQ, about how STRMU can be used under CARES Act funding. This question is really about what flexibility programs have with these funds and how the programs could be implemented.

We want to make sure that everyone understands that right now, there is only one change to STRMU under the CARES Act funds, and that is that the normal limit – time limits of no more than 21 weeks of assistance in a 52-week period has been extended.

So when using these funds, programs can extend STRMU assistance for up to 24 months, but all of the other STRMU requirements remain unchanged, including all of those shown here. You would use the same kinds of eligibility requirements, that people have to have legal residency in the housing, demonstrate need for assistance, and also you have to comply with – you know, making sure that households have the opportunity to receive case management services.

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We've also had questions about how this additional extended STRMU might work and how it could be best managed. That's not really easy to answer because the need and the level of funding will be different in each community. We don't really have a definitive answer to this, but we've provided some thoughts here on some different ways you might approach to use to – that you might use to approach the use of that extended STRMU.

You could cover rent, mortgage, and utility payments through CARES Act funding only after a household has reached the 21 weeks of assistance from your regular HOPWA allocations; that would be one way - is always move people on to that new funding for the extended part of their STRMU.

The assistance could be limited to more than 21 weeks, but less than 24 months, that is a local decision that could be made about how much you're going to be able to extend it based on how much demand you have and the funding that you have.

All eligible households, whenever possible, could be covered with extended STRMU up to the 24 months or a cap set locally, or you could consider that on a case by case basis, based on what the need is.

And also, you may want to look at extended rent or mortgage payments versus utility assistance very differently, especially if utility assistance, for instance, could be covered through other local sources. So those will be local decisions that, that you would be making.

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Let's also clarify that STRMU, whether it's funded through your regular HOPWA allocations, or through the CARES Act funding may not be used to assist households that are also receiving ongoing rental assistance, such as HOPWA TBRA, Section 8 vouchers, or other long term rental assistance for that same period of time. So that's a requirement that has not changed.

So you cannot use STRMU to pay for client rent portions that were not paid for or past due utilities for anyone who's receiving ongoing rental assistance. That would be considered an overlap in assistance and programs would need to look to other non-HOPWA sources for those kinds of arrearages.

The – and we'll point out that the only overlap that's really allowed related to COVID-19 and the CARES Act is that any clients who are currently receiving rental assistance, whether it's TBRA or STRMU, could also receive hotel/motel vouchers, specifically for affected family members to allow for isolation when needed due to COVID-19 infection. So, people who are receiving TBRA in household and you've got someone who needs to be isolated and put in a hotel room, that would not be considered an overlap. That would be allowed.

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So during the last webinar, we briefly talked about the waiver on self-certification of income and credible information on HIV status. But we wanted to revisit it - this time in a little more detail, especially since we've received quite a few questions on how this should work through the AAQ.

This is the full waiver, which addresses both self-certification of income and accepting information – credible information on HIV status. It basically allows programs to temporarily bypass the normal income and HIV status documentation process for households whenever needed, in order to facilitate quick entry to the program or avoid delays.

This waiver, if it's been requested by grantees, lasts until local public health officials determine that no additional special measures are needed in the community, and in using the waiver, programs agree to obtain the proper source documentation within three months of that time. So, let's talk about both income and HIV status individually.

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The question shown here is: Does self-certification of income apply only during intake to determine HOPWA eligibility? And the answer is no. This self-certification, when necessary, can apply to multiple program functions in which income documentation is a factor, including intake and overall program eligibility, of course, but also income and rent calculation for TBRA, master leasing or facility based housing, or annual and interim reassessments for rental assistance.

As a reminder, in practice, programs should continue to collect appropriate source documentation for household income whenever you can. When that kind of documentation is not available, the waiver allows you to use this self-certification of income in order to expedite delivery of needed housing and services.

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Some questions have also come in about credible information on HIV status. And the question is, how should we utilize the HIV documentation waiver, and do we apply it to all applicants? And you definitely do not apply it to everyone, but only when it's really needed.

A couple of notes about that. If you can obtain appropriate source documentation about HIV status, you should definitely continue to do so. But the idea – the idea behind the waiver is not to delay approvals based on lack of

documentation. When the source documentation is not available, you can use lesser forms of documentation or self-certification, but you should make sure that you note in your records that you're making use of the waiver, and that policies are in place to obtain the source documentation once community restrictions have been lifted.

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Understandably, people are asking what they should consider as credible information about a person's HIV status. Self-certification can be sufficient without any actual written documentation when none is available. So, some examples are provided here based on the types – based on the types of information the client is able to share during intake conversations that demonstrate their knowledge of their HIV status, including such things as their medical history, their HIV medical history, medications taken, doctors or clinics that have treated them, knowledge of their viral suppression and things like that.

It could also include another agency's or worker's knowledge of that person being HIV positive. So, we think programs might consider having a brief set of questions that would kind of prompt or elicit that kind of information, credible information during intake when that's really necessary, when you're unable to get the other written documentation.

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We have not specifically talked about the HOPWA Space and Security waiver provision to-date. So, we wanted to highlight it here. It may not be clear to all programs what this provision means and how it can be used. So, we're doing that now.

Basically, the space and security requirements fall under general standards for eligible housing activities and HQS habitability in the HOPWA regulations and relates to the space provided for clients in any unit or residential setting.

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Some people have asked us for examples of how this could apply to their program. The space and 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.

Essentially, this is one of the habitability criteria that's considered when you're doing an HQS or habitability inspection. What this waiver provision intends is to allow programs the flexibility to do things like temporarily house a household in a space that would otherwise be considered too small, just, such as hotel rooms. You may have a family that you have to put in one room rather than putting everybody in individual rooms.

You can set up unconventional spaces like a dining room or other space within a facility as temporary housing or quarantine space, and other similar situations like that. It just gives you that little extra added flexibility.

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OK. So, during the last webinar, we provided some new guidance that HOPWA programs are allowed to purchase cell phones for clients when needed to facilitate remote work and communication. So, we've received, as a result, quite a few questions about how that could be done, what the rules are and so forth.

So this information should give you some more concrete answers, we hope. So let's just walk through them. The 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 clients safety and stability.

The phones must be owned by the project sponsor. And if you're doing wireless service plans, that has to be in the project sponsors' name as well. And those phones may be loaned to clients, not given to them permanently, and should be returned to the sponsor when the emergency need no longer exists.

We've been asked about prepaid or disposable phones and whether those can be given to clients. Those are certainly, maybe less expensive options that would be workable to keep communication with people. But those are also may only be loaned to clients and would need to be returned to the agency. You can also purchase phone cards or minutes for clients who already own a phone when that's needed for the purpose that's outlined here.

And when – whenever you are doing any of these kinds of costs for phone, phone cards or phone minutes, those kinds of costs can be charged to HOPWA Supportive Services.

And note, we talked last time about the fact that it is certainly possible for sponsors to also purchase phones for TBRA programs that would be charged to TBRA, that could be temporarily loaned to recipients or landlords when needed to conduct virtual inspections. But that's a somewhat different issue.

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So, Nutrition Services. The provision of food and nutrition services remains a very major concern from what we hear on the part of programs during this time when communities are shut down to varying extents. And when people who are HIV positive, who may be very vulnerable to COVID-19, try to deal with getting food for their families.

All of that is complicated by downturns in incomes due to layoffs and other issues that make it difficult for people to either afford or procure food for their family. So, the basic guidance as shown here indicates that food can be provided in forms such as food banks, groceries, food boxes and a meal or grocery deliveries.

Methods to provide the food and groceries to households can also include the use of grocery store cards; food delivery by staff or contracting with food delivery services for meals or groceries; food and grocery site pickups, pickup sites for clients or any other methods like that, based on what your resources are, what the local needs are, and what else is being provided that your clients can make use of.

Most grantees we've spoken to are using a variety of these approaches based on their local situation. Because this guidance includes the use of grocery store cards, which can be given to eligible households, which was something that was previously not allowed under the HOPWA program, we've added here the caution shown on this slide, which is to encourage programs to do their best based on their local situation, to set up a system that restricts such cards to purchase of food items whenever possible and to put documentation in place on the dispensing and tracking of any such cards.

Valencia, now I do not have control. Here we go. Thank you.

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And finally, transportation for clients is also a major concern. The newest guidance reflects that gas cards may be used to help with transportation for eligible households in order to access medical care, supplies, food, commute to work and all those kinds of things. And I would just say that the same cautions apply here as those we mentioned when you're using any kind of card that goes to clients.

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And that's the end of our Q and A slides that we're going to cover. I know that we have questions coming in and we're going to get to those in just a second.

We would want to make sure that- want to remind people to stay informed. As Kate said in the beginning, the guidance and information that's coming out is changing rapidly. There are new things every day. There are new notices that will be coming out.

And so we would just say, keep your eye on everything that comes up through the HOPWA listserv and the COVID-19 HOPWA guidance landing page, which are both listed here and making use of any of the resources that have already come out, and there are links to these in the presentation.

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And also, we want to make sure that people get the answers that you need. And I know everybody's situation is different and individual. So, I encourage people to use the HOPWA Ask A Question desk. Grantees and sponsors and other interested parties can ask any kind of question in there related to the HOPWA program and COVID-19.

And technical assistance is available to grantees to support these new activities and planning, problem solving, different kinds of things, at the link shown here through the HUD Exchange. So I'd really like to add before I pass this on to – for questions to be answered, we'd like to ask everybody who's on the webinar to put some information in the chat box right now about what types of technical assistance your programs need, what issues you're dealing with that you could use some help with and support on.

I think that information would be very helpful to HUD as they move forward with rolling out the new HOPWA technical assistance.

So, with that, I'm going to turn it over to Christine and Emily to walk through some questions for us, for the OHH folks.

Christine Campbell: Thanks, Crystal. As you can imagine, there are a lot of questions. So first let's start with: If we are using the FMR rent standard waiver for TBRA and increasing allowable rent, utilities for TBRA units, how do we return to the normal rent standard after the one-year period ends?

Ben Ayres: So, this is Ben Ayres with OHH. That is a really great question. So, the HOPWA regulations on the rent standards are laid out at 24 CFR 574, 320 (a) (2) and those of course are waived for one year beginning the date of publication that mega-waiver memorandum that went out. So, for a client placed in a TBRA unit during this time period, the new rent standard is to be used for the entire duration of the lease on that unit.

So, a grantee would not need to revert back to a normal rent standard for any client (inaudible). Once that client's lease is up, they will, of course, need to

be in a unit that meets the rent standard, and we have an FAQ out there on how to handle units that are above FMR, that might give you some more flexibilities. It's a little bit too much information to go on, to go into on a Q and A.

So, if you all want access to that FMR, and more TA around that, submit that into the AAQ and we'll make sure you get that information.

Christine Campbell: Thanks.

Emily Fischbein: Thanks, Ben. We have a question, Ben, Rita, and Amy from a grantee. What types of data should we be using to determine the best use of our CARES Act funds?

Rita Harcrow: Hey, this is Rita. I'll try to answer this one. Yes, it's really tough right now to think about all the sources of data because in real-time everything is changing so fast and the sources that we're used to may not be as reliable right now. And the COVID-19 data, if you watch the news, can change from day-to-day. So, I appreciate that question, and that situation that everybody is facing.

But given that, there are some resources that you could lean on, things like Ryan White data, your own HOPWA needs assessment or analysis, maybe that's been done in your community. You know, check in with project sponsors, with providers and find out what the needs currently are for everybody that's currently being served.

And I think it's really important to remember to get information from people with lived experience, including the currently assisted households that you're already working with. You know, what are the immediate needs that they can express? And how can that inform your program?

Then some things you need to think about what the future needs are, because we're asking you to kind of project and think about what your program design might look like or what kinds of services you might need to fund. And so, for that, you would probably want to consider employment. You know, if unemployment is increasing dramatically and it is across the country, how does that look in your community? What resources are already in place to

assist unemployed people? What kind of industries do you have there that might be heavily impacted?

And if you get information that tells you, yes, that's the situation in my community, then you would really want to think about Short-term Rent, Mortgage, Utility assistance and a possible increase in TBRA costs. So, for those households that you're already helping, their rent share might go down because their income goes down. So, you might need to put money in your budget for that as well as STRMU.

And you might also want to think about eviction. So that might happen further down the road, as we've talked about evictions, the moratorium on evictions - and many states and cities have that as well as the federal CARES Act provision on the moratorium on evictions.

So, there may be a time though that we see a surge in those evictions. And that would point to, we're going to need PHP - Permanent Housing Placement services to get households into new units. So that's part of the longer-term recovery. And then we've been talking about this from the beginning - to really look around and see what other services are happening.

Ryan White received CARES Act funding as well. So, you know, they're doing some COVID-19 specific activities. You want to coordinate with that. Are there food banks that are, you know, doing something different or meal delivery programs? FEMA, some of your other HUD programs, ESG and CDBG also got CARES Act funding and some of it might overlap with things that you're thinking about doing. So that's going to look different for every community.

So, that's not necessarily data that you can pull up and read about right now. You might have to make a phone call or reach out to get some of that information to inform your program. That's it.

Christine Campbell: Thanks, Rita. We received another question. If we decide on activities to deliver with CARES Act funds, but later find that a different mix of services is needed, how can we make that change?

Amy Palilonis: So, this is Amy. I can take that question. So, just very, very generally speaking, a formula grantee would need to amend their Annual Action Plan or Con Plan in order to make changes to the types of activities being provided. And a competitive grantee would need to submit an amended plan to HUD.

But if you find yourself in a situation where you are considering changes to your CARES Act response in the future, I would definitely just suggest reaching out to your field rep to discuss, you know, what you're thinking and sort of talk through those changes. And more guidance can definitely be provided at that point based on your specific situation.

Emily Fischbein: OK, great. Thank you, Amy. The next question is: We hear there will be more information coming out, about reporting. But in the meantime, can you advise on the types of information project sponsors should be collecting?

Ben Ayres: This is Ben. I can take that one. So, yes, you are absolutely correct that we're going to have additional information coming out on reporting requirements - that is forthcoming. In the meantime, you should make sure that you're collecting similar information that (inaudible) under the CARES Act funds that you're collecting under your normal HOPWA grants, that this would be things like the individuals assisted, their demographics, the types of assistance provided and amount of funds expected, excuse me, expended by activity.

In addition, things like the number of non-HIV positive household members that received hotel/motel assistance (inaudible) and those are the things that are (inaudible). Now, and just as a reminder, activities that are performed using the HOPWA CARES Act funding will require tracking (inaudible) of the tracking of already funded HOPWA activities.

So, the HOPWA CARES Act funding represents a separate allocation and award from HUD. And it will need to be kind of tracked and drawn in IDIS as a stand-alone allocation with new Projects created relative to this new funding source. And then, of course, the performance will need to be reported to HUD separately from the performance on other normal HOPWA awards and allocations.

Christine Campbell: Thanks, Ben. Our next question is: Can you clarify whether we need to document COVID-19 impact on individual households in order to provide them with services with CARES Act funding?

Rita Harcrow: This is Rita. I'm going to try to take that one and the answer is no. So, grantees, project sponsors, you don't have to formally document an individual situation for – so an individual household doesn't have to have something stating exactly the way that they're impacted by COVID-19. There's no kind of certification requirement in order for them to be served.

We're thinking about COVID-19 impacting every aspect of the community. I know it's impacted my life and everybody on this phone. So, we're not looking at just that one person having to explain how it's impacted them.

Documentation can include the larger picture, the trends, the unemployment trends, the homelessness information, whatever the overarching need is in your area. That's what you should be expressing and not tie it specifically to an individual requirement.

Emily Fischbein: Thanks so much, Rita. The next question is very specific, but it relates to our transportation slides. The question is: Does transportation assistance include repairs or parts for client's vehicles?

Amy Palilonis: This is Amy. I can take that one. So right now, at this time, car repairs or parts for client's vehicles haven't been designated as eligible expenses. But if grantees are really seeing a need for this and there is justification for it, we will definitely work to see if we can address that need. But we also definitely suggest determining if there are other community resources or grant programs that could cover car repairs or parts, you know, before requesting to use HOPWA funds to do so.

Christine Campbell: We've got several questions around STRMU. Are we able to set a cap on the STRMU assistance provided with CARES Act funds at less than the 24 months allowed in the act?

Amy Palilonis: So, this is Amy. I'll take that one too. So, (inaudible) make those local decisions about how to implement the extended STRMU assistance that's

allowed under the CARES Act. I think it was mentioned earlier that programs may set policies on STRMU, including how decisions will be made on extending that assistance and whether or not it will be extended for 24 months for everyone. If there's enough funding for that or if there will be a cap such as 12 months or 18 months or a specific dollar amount, or if the extensions will be made on a case-by-case basis.

So, there's definitely a lot of flexibility there. And local programs will need to set policies about how this extended STRMU will be implemented.

If caps on the allowable amount of STRMU assistance are established, the cap should be applied in a uniform, consistent, and non-discriminatory manner based on the policies and procedures that you set. And it should be implemented the same for all of the funded project sponsors.

And if the grantee establishes a capped amount of assistance, the use of a limit should be included in the formula grantee's Annual Action Plan or Con Plan amendment that you'll be submitting, as well as the competitive grantees planned submission for their CARES Act.

Emily Fischbein: Thanks, Amy. That's a lot of good information. Next question we have is: How does working remotely change the way we obtain and document client release of information forms?

Rita Harcrow: Hey, it's Rita. So, it's definitely different now. Whereas, I think a lot of folks were still using a wet signature and that was a requirement on certain things, that's something that we're trying to bypass, you know. So, not just for the release of information that you mentioned, but for any kind of forms. It's appropriate now to think through your policies, your procedures to see what you can bypass. And we're doing that at the federal level. We're working on analyzing, you know, what can we do differently so that we don't have to mail things back and forth and adjusting that at our level too.

So, I think just looking through what you can have signed, scanned, emailed, whatever the client has access to, it could even be, can they snap a picture of it and text it? So, you know, it's time to be creative and think of what we can do

remotely and just develop your policies and procedures around that, given the circumstances that we're all living under right now.

Emily Fischbein: Thanks.

Christine Campbell: Our next question is: How soon will technical assistance be available? How do we access it? And what kinds of help can TA provide?

Ben Ayres: This is Ben again. Great question. So, the TA funds, of course, were awarded to HOPWA TA providers and more information will be available on how to gain access— how to participate in that TA shortly.

So, the TA providers, of course, will continue to answer questions through the AAQ portal. So please continue submitting your questions there. Grantees that are in need of individualized TA related to responding to COVID-19 or even just the regular HOPWA program administration should go ahead and submit a TA request via the Request Program Assistance webpage on the HUD Exchange portal.

And then individualized TA can include things like IDIS Project and Activity Setup, reconciliation of funding once the CARES Act funds are received and then planning and problem solving around the use and the implementation of CARES Act funding.

Emily Fischbein: Thanks, Ben. Another question that we have here is: If we loan cellphones to clients, but they are not returned, how do we handle that in our records?

Amy Palilonis: So, this is Amy. I can handle that. That's a really good question that we were definitely anticipating. So, really, the way you would handle this situation would be similar to the way that you handle a return of security deposits to the program that are made through PHP. You know, obviously do the best that you can to get those security deposits back, but, you know, sometimes things happen and that's not the case.

So, what – for the cell phones, what will really be most important is that you have a process in place to request the return of the phone. You know that there are processes that you'll follow up with clients in writing and, you know, place

all of that information, plus the outcome in each client's file. You really just want to be able to show that you used due diligence in getting the equipment returned. But obviously, there is no guarantee that that will happen in every case.

But really just putting policies and procedures in place to ensure that, you know, the best effort is made in order to make it clear to the clients that the phones are just being loaned to them and that they are intended to be returned to the program.

Emily Fischbein: Excellent.

Christine Campbell: Thank you, Amy. We've got a few more questions. The next question is: How much time will we have to spend HOPWA CARES Act funds once we receive our contract?

Ben Ayres: So, this is Ben. I can take that one, so the performance period is just like for normal grant agreements, the three-year performance period and when you draw down funds for activities - that should be normal as well. Follow the 2 CFR 200 requirements, you know, as close as possible to the expenditure of – the incurrence of the actual expense.

Emily Fischbein: Thanks, Ben. We have a couple of related questions that came in, and this is pretty important. So, I'm going to see if you guys can answer this one now too. A few people have asked: Is there any more information on when the funding notifications will be released? Somebody else phrased it: When will grantees be notified of the amount of CARES Act funding they will receive? So, I wanted to field that over to you guys.

Rita Harcrow: Hey, it's Rita. I'll try to answer that one. So, the question about when will grantees hear about their allocation? So, the letters have already gone out to that, to the grantees, with the amount of your allocation and some initial information about how to start planning to receive those funds. There's also a link to the funding across all the CPD programs that got CARES Act funding on our COVID-19 landing page for HOPWA.

So, you can go there and click on that. You can see the allocation for the grantee. And there's also on that page the body of the letter that went out, so you can read some of that other background information on planning. If it's a project sponsor asking about the amount that they will get that will be a grantee announcement. So that will come from the grantee level out to the project sponsors as they make those sub-awards and contracts available.

The big question is when, when will money start flowing? So, we're in the final stages of the Notice process. Hopefully, that will be out any day. You know, it's been a little tedious trying to get that out but we're rushing and doing it as quick as we can, folks. We're posting guidance as much as we can, again, on initial steps you can take even before the notice is posted on how to prepare for that substantial amendment process and all of that.

So, hopefully within a few days, all this information will come to light. And then the ball will be in your court as the grantees in responding and getting information back to HUD as quickly as you can and getting those amendments done as quickly as you can.

So, I also want to point out we've been providing information about how to use current funds, how you can even pay for things out of the CARES Act that you – activities that you covered in say, April, if something that you're hearing about here qualifies and that's something you're planning to do. So that's some of the guidance that's here for a reason because we recognize there's going to be a time lag between the need and when we can get that funding out the door. It's not instant.

We're doing as quick as we can. But in the meantime, do look at what you can do with your current awards or with general funds if you have that, to cover these costs now and then reconcile it later to the CARES Act.

Emily Fischbein: Thanks so much, Rita.

Christine Campbell: Thank you, Rita. We've got several questions around IDIS. So, can you talk a little bit about how the CARES Act funding should be reported in IDIS, should new programs be established, et cetera.

Katie Pittenger: Sure. Hi, this is Katie. So, there will be some information coming out, hopefully in the next day or two that really spells out for each step of the Annual Action Plan amendment, what the grantees will need to do - formula grantees, but for both, formula and competitive grantees will need to set up brand new Projects that are CARES Act specific and those will have their own Activities.

And then, so it will kind of be siloed. So, the CARES funds will be drawn directly to those Projects and Activities. And then just a note about if grantees are using existing funds to cover costs in the meantime, while they're waiting on CARES Act funds. Grantees should just make sure that they are tracking closely with voucher numbers those costs so that when we begin the reconciliation process, we quickly identify those costs that need to be addressed.

Emily Fischbein: Great. Thanks, Katie. Here's one that was touched on in the webinar and was touched upon in previous webinars, but it's so important that I'm going to field this out to you guys again. And the question is, do we need to keep separate records for CARES Act fund expenditures, or can we simply include expenditures along with our other funding?

Ben Ayres: So, this is Ben and this is kind of a follow-up on the reporting one. So, yes, you're going to want to track that funding separately. You're going to have to bill in IDIS against it separately. And so, again, the financial management practices, you should be able to follow those expenses all the way from the project sponsor's internal accounting system to the grantee internal accounting system to IDIS backward and forward.

And then, of course, you will need to report – you'll likely need to report on the expenditure of those funds by, you know, Activity category. So, you're going to want to track those things separately. Yes.

Christine Campbell: We're going to go back to STRMU. We had a couple of questions around whether or not you have to expend your current STRMU funds before you used the CARES Act STRMU funds.

Rita Harcrow: So, this is Rita. I'm going to try to answer that, I'm not sure I understand exactly, but I think that there was a slide about this that Crystal presented. So, the CARES Act authorized STRMU beyond 21 weeks, up to 24 months. So that's not allowable in your regular HOPWA award. So, you would need to think about how do you want to balance that?

If you have STRMU in your current award and you want to continue using that for the shorter-term, develop some policies or procedures around how you want to do that. You could then move a person if they – because of COVID-19, you know, unemployment and those kinds of things, they might need a longer-term. That could be paid out of the CARES Act.

You could also start using CARES Act from day one for new people that are being assisted with STRMU in your program. So, I hope that answers the question. I know it's very nuanced so that might not be exactly the question, but again, if you could get your questions into the queue, we're going to try to answer those in upcoming responses and webinars.

Crystal Pope: And let me just add that, that in looking at all the questions that have come in, really good questions, folks. Make sure because we can't answer all of them on this webinar that you use the HOPWA AAQ, which will give you a more in-depth and more official kind of answer to your questions. And that's what that resource is for.

Christine Campbell: And there's also an opportunity to get technical assistance on any of these areas, if you need some one-on-one in setting up any of these systems.

So, there are a lot of questions, but given the time I wanted – I do – Emily do you see one that needs to be answered immediately?

Emily Fischbein: Do we have time for more questions, or do we need to move on?

Christine Campbell: I think we have time for maybe one or two more, if you... The only one I see is just sharing again the use of hotels and motels and where that should be charged to?

Ben Ayres: So, this is Ben. I think what we've discussed now, and Rita and Amy and Katie of course can chime in as well, is that for grantees that don't have a leasing line item in their current budget and aren't currently providing that resource, can just track that and pay for it through any budget line item and then reconcile that once you get your CARES Act funding. And then, of course, under the CARES Act funding, the budget line item that would need to set up would be the leasing line item.

Christine Campbell: Thank you.

Emily Fishbein: So, if we have time for another question, we did get one that relates to some things we've talked about in previous webinars. So, the question is, will there be any waivers on lead-based paint regulations as they apply to HOPWA, or are there any waivers now on lead-based paint? So, how should folks handle that as part of the inspection?

Rita Harcrow: So, this is Rita, and I have not worked on that directly. However, I know that we are working on additional waivers right now and we may have a further round of those in the future, so just stay tuned for waiver information around that unless any of the other OHH staff have more updated information than I have.

Amy Palilonis: No, this is Amy. I mean, you're right. As far as we know now, nothing has been waived. You know, there are the possibility for future waivers. But at this time, those requirements haven't been waived.

Crystal Pope: Amy and Rita, this is Crystal. I think we have to also look at this from a point of view of people doing remote inspections, which we've talked about. And they are delaying, through the waiver, you know, doing onsite inspections.

But we did talk about, if possible, when you're doing a video distance kind of inspection that at least a look at lead-based paint information is something that could be done. But then afterwards, once this is all over, people will have to go back and do those inspections anyway, including lead-based paint. So, I think part of its, you know, the timing and what they're doing to temporarily delay some of the inspection.

Amy Palilonis: And that's a good point. And also, you know, documenting the age of the property and the make-up of the household as it applies to the lead-based requirement.

Crystal Pope: Right.

Christine Campbell: So, with that, I think we'll pass it back to Kate to close out.

Kate Briddell: Hi, everyone. Thanks for all the great questions and thank you to the staff at OHH for responding so thoroughly to them all. With that, I want to thank you again for joining us today. And we look forward to working with you in the future. Please be sure to put your further questions into the HOPWA Ask A Question portal, and be sure to put your technical assistance requests in as well.

We will be coming back to you soon with another webinar to provide answers to additional questions and update you all as new notices or new waivers come out. So, thanks again for joining us. Take care.

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