



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

April 22, 2020



# Presenters

Kate Briddell, HIV Housing and Health Program,  
Collaborative Solutions

Crystal Pope, HIV Housing and Health Program,  
Collaborative Solutions

OHH Staff available for questions:

Rita Harcrow – Director

Ben Ayers – Deputy Director

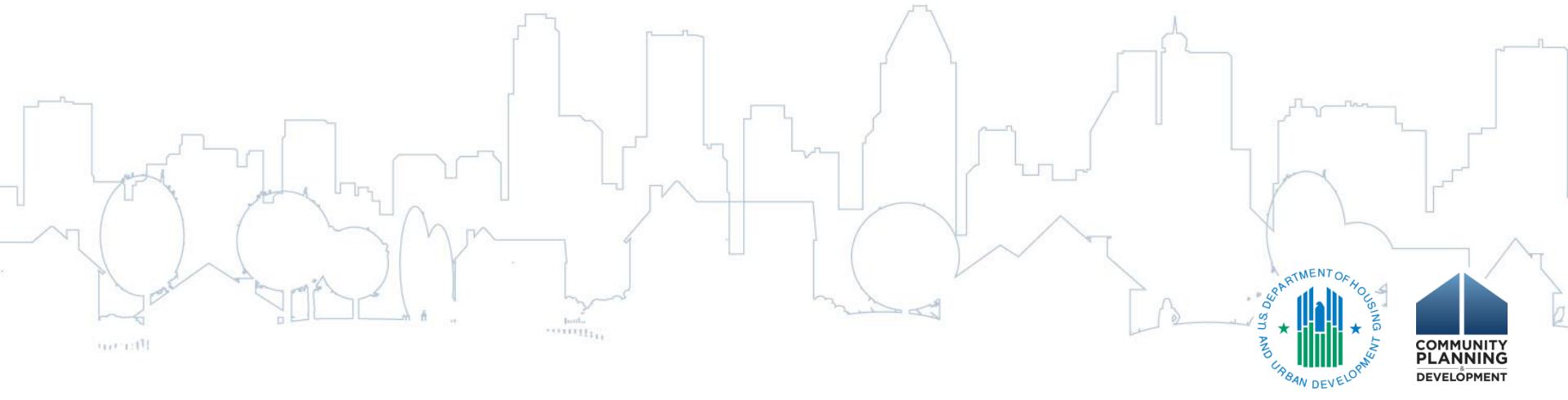
Amy Palilonis – Senior Program Specialist

# Webinar Objectives

- Provide a review of frequently asked questions from HOPWA grantees and sponsors in response to COVID-19-related waivers, 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



# Mega Waiver and CARES Act Provisions



# Mega Waiver Background

On April 1, 2020, HUD issued a memorandum providing regulatory waivers of certain Continuum of Care (CoC), Emergency Solutions Grant (ESG), Housing for Persons With AIDS (HOPWA), and Consolidated Plan requirements to help:

- Prevent the spread of COVID-19
- Provide additional supports to individuals and families eligible for CoC, ESG, and HOPWA assistance who are economically impacted by COVID-19



# Mega Waiver Questions

**Q: What HOPWA regulations are waived?**

**A:** The memorandum makes waivers available to HOPWA recipients for the following:

- **HOPWA Self-Certification of Income and Credible Info on HIV Status:** 24 CFR 574.530, Recordkeeping
- **HOPWA Rent Standard for TBRA:** 24 CFR 574.320(a)(2), Rent Standard
- **HOPWA Property Standards for TBRA:** 24 CFR 574.310(b), Housing Quality Standards
- **HOPWA Space and Security:** 24 CFR 574.310(b)(2)(iii), Space and security



# Mega Waiver Questions

**Q: What are the waivers in place for the Con Plan?**

**A:** The memorandum modifies these two sections related to Con Plan:

- **Citizen Participation Public Comment Period for Con Plan Amendment:** 24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401
  - Reduces the 30 day comment period to a period not less than 5 days
- **Citizen Participation Reasonable Notice and Opportunity to Comment:** 24 CFR 91.105(c)(2) and (d), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401
  - Grantee should determine and document what constitutes “reasonable notice.”



# Mega Waiver Questions

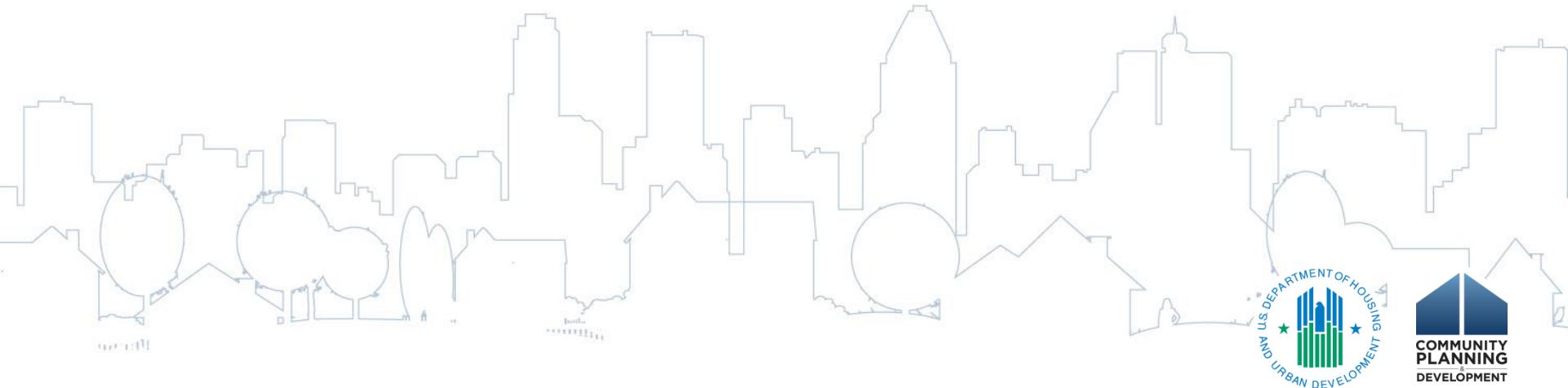
**Q. I've notified my Field Office's CPD Director of my jurisdiction's decision to use all of the available waivers. Is there anything else I should do related to the waivers?**

**A.** Yes. First, a reminder that you need to **wait two days** from the date of notification **before you implement** any of the new flexibility.

Secondly, we suggest that you establish a **written set of emergency policies and procedures** related to the COVID-19 pandemic. These policies should outline: 1) the waivers you're using; 2) how you're implementing those waivers; and, 3) the records you will maintain to support the waivers.



# CARES Act Provisions



# Award Information

CARES Act provides \$65M in supplemental funding for HOPWA

- \$53.7M for formula grantees using the same data elements to determine their FY2020 HOPWA formula allocations
- \$10M in one-time, non-renewable funding for competitive grantees that is proportionate to their existing grants
  - Note: Competitive Grantees are not required to use their supplemental grant funds on permanent supportive housing activities
- \$1.3M to TA providers as an increase to prior award



# Eviction Moratorium

- The CARES Act contains a moratorium on evictions for assisted households.
- Assisted households cannot be evicted for 120 days from March 27, 2020 (the date the CARES Act was signed into law) through July 25, 2020.
- Moratorium only applies to HOPWA-assisted households that receive on-going rental assistance in Tenant/Project-Based Rental Assistance (TBRA/PBRA), Transitional Housing (TH) and Short-Term Rental Assistance under STRMU (Short-Term Rental, Utility and Mortgage Assistance).
- Households that only receive utility and mortgage assistance under STRMU are not covered by the CARES Act moratorium on evictions.



# Eviction Moratorium

- During the 120-day moratorium, a landlord cannot: require a protected tenant to vacate a unit, issue a notice to vacate to a protected tenant, file to evict a protected tenant (or cause an eviction to be filed) for non-payment of rent or for non-payment of other fees or charges or accrue fees, or other charges on a protected tenant for non-payment of rent.
- The eviction moratorium found in Section 4024(b) of the CARES Act only applies with respect to nonpayment of rent or nonpayment of other charges. Therefore, landlords may still undertake an eviction action against a tenant, based on the terms of the leases, as long as the eviction is unrelated to nonpayment of rent.
- After the 120-day moratorium ends, a landlord cannot require a protected tenant to vacate the tenant's unit without providing a notice to vacate at least 30 days in advance.



# General Use of Funds

- CARES Act funds are to be used to “maintain operations and for rental assistance, supportive services, and other necessary actions in order to prevent, prepare for, and respond to COVID-19.”
- Funds may be used to provide eligible HOPWA activities identified at 24 CFR Part 574 in a manner that addresses the needs of each grantee community related to COVID-19 preparedness and response.
- CARES Act funds may also be used to self-isolate, quarantine, or provide other coronavirus infection control services as recommended by the CDC for household members not living with HIV/AIDS.
- CARES Act funds may be used to cover or reimburse allowable costs incurred by a grantee or project sponsor for allowable activities regardless of the date on which such costs were incurred.



# CARES Act Eligible Activities

How does HUD expect the HOPWA CARES Act funds to be used?

- CARES Act funds are to be used as **additional funding** to maintain operations and for rental assistance, supportive services, and other necessary actions in order to prevent, prepare for and respond to COVID-19.
- Funds may be used to provide **any eligible HOPWA activities** identified at 24 CFR Part 574.
- Grantees must use these funds to provide activities that are consistent with their **community needs for COVID-19 preparedness and response**.
- In order to protect PLWHA, funds may be used to **self-isolate, quarantine**, or provide other COVID-19 infection control services as recommended by the CDC **for household members not living with HIV/AIDS**.



# CARES Act Eligible Activities

Specific COVID19-related Activities Covered by the CARES Act:

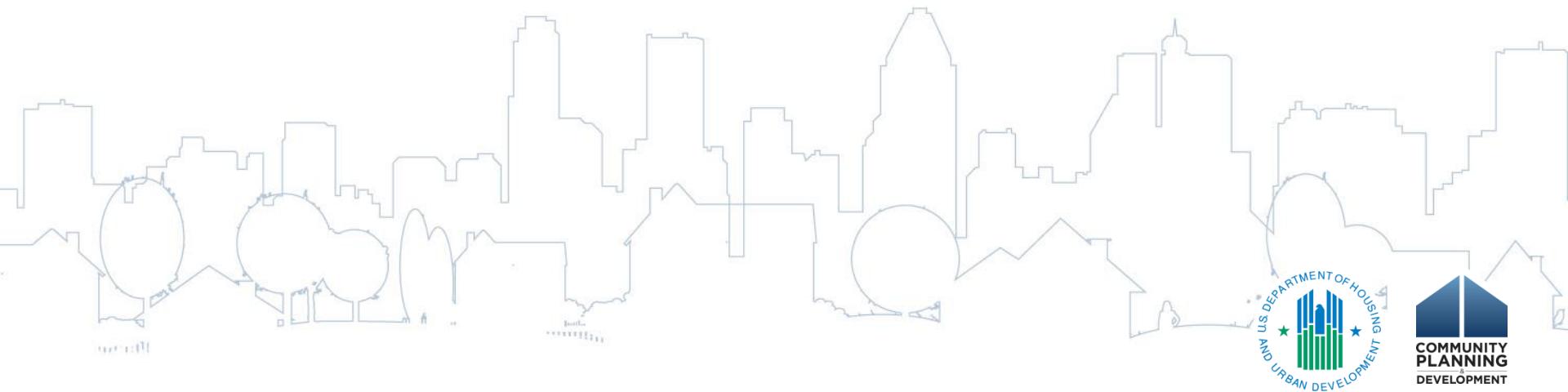
- Stays at **hotels, motels** or other locations to quarantine HOPWA-eligible individuals or their family members;
- Providing **transportation** services, including costs for privately-owned vehicle transportation to access medical care, supplies, and food or to commute to places of employment;
- Assisting households in **accessing essential services and supplies** such as food, water, medications, medical care, and information;
- Providing **nutrition services** in the form of food banks, groceries, and meal deliveries;
- Educating households on ways to **reduce the risk** of getting sick or spreading infectious diseases such as COVID-19 to others; and
- Costs related to **infection control measures** such as cleaning and disinfectant supplies, gloves and other safety-related supplies for staff and assisted households



# CARES Act Eligible Activities

## REMEMBER:

Grant funds provided under the Act may be used to cover or reimburse allowable costs incurred by a grantee or project sponsor for allowable activities to prevent, prepare for, and to respond to the COVID-19 pandemic regardless of the date on which such costs were incurred.



# Administrative Costs

The Act increases the caps on administrative expenses for both grantees and project sponsors.

- A grantee may use up to 6% of CARES Act funding for administrative purposes
- A project sponsor may use up to 10% of its CARES Act subaward for administrative purposes
- Note: These admin cost limits are **only applicable to the supplemental grant funds** provided under the Act. All other HOPWA awards limit admin expenses to 3% of the grant amount for grantees and 7% for project sponsors.



# Next Steps for All Grantees

- Develop planning and budget documents for the funds (requirements on next slides)
- All grantees (competitive and formula) must sign a new grant agreement with HUD in order to accept the CARES Act funding
- Each Field Office will inform their respective grantees of the process for executing the grant agreement.
- 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.
- The selection of project sponsors under the HOPWA program is not subject to the procurement requirements of 2 CFR part 200, subpart D (see 24 CFR 574.3).



# Planning & Budgeting

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:

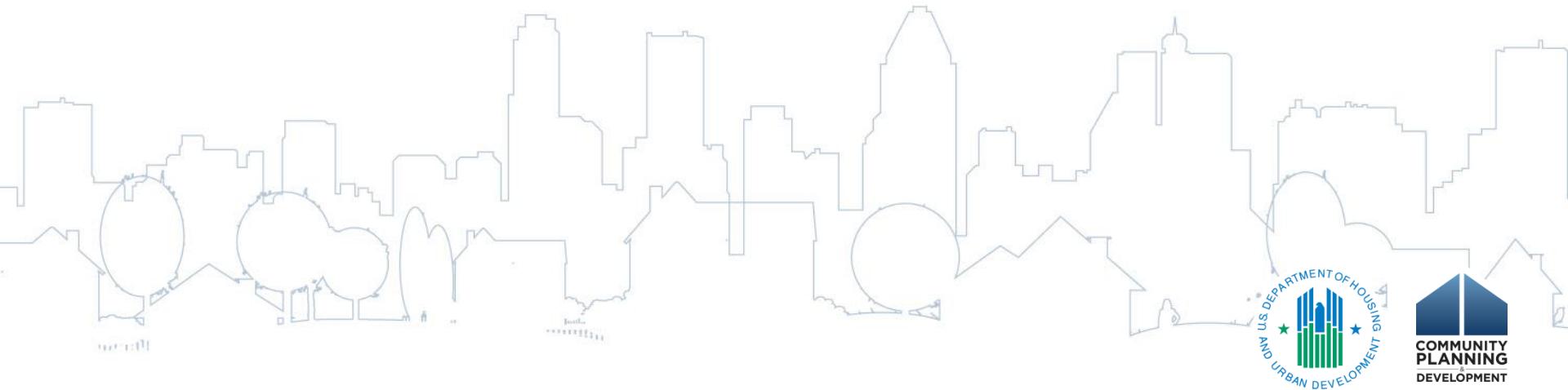
- Consider the emerging needs of your **current clients** and anticipate that more needs will emerge from PLWH who are not currently needing services.
  - Determine **what is already available** from other resources in your communities, such as food banks or Ryan White services.
  - Consider **new resources** 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 & Budgeting

## REMEMBER:

- This is a “one-time” award and must be **directly related** to the COVID-19 crisis.
- Grantees should carefully consider adding any type of permanent housing, like TBRA, that would require ongoing funding to support.



# 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.



# Specific Steps for Formula Grantees

*If you have notified the FO that you are using the Con Plan Waivers:*

7. Determine, document, and follow your “reasonable notice” to the public about the substantial amendment to your Con Plan.
8. Begin the not-less-than 5-day comment period. Respond to any public comments. Submit your Con Plan for approval.

**The Consolidated Plan amendment process must be completed before the CARES Act grant agreement is executed.**

The CARES Act grant Period of Performance starts on the day the grant agreement is executed and extends 3 years (24 CFR Part 574.540 ).



# Next Steps for Grantees for IDIS

*Anticipated Guidance (currently under development):*

- All HOPWA formula and competitive grantees must set up new 2020 projects and activities in IDIS to use solely for HOPWA CARES Act funding.
- The project and activity names should include “COVID-19” and follow the naming convention tool (updates forthcoming).
- Formula grantees must create stand-alone 2020 projects and *then* add them to the AP-35 screen (year of the project MUST match year of the funding).
- Grantees should add information on funding and household count by eligible activity for the following text fields on the project set up screen:
  - *Estimate the number and type of families that will benefit from the proposed activities*
  - *Planned Activities*

More guidance coming...



# CARES Act Agreements

**Q: When can we expect to receive the COVID-19 grant funds? Will the grant agreement come to our offices directly in paper form or in some other way? With the office working remotely, we want to be sure we do not miss notifications.**

**A:** Grantees will receive additional information soon on the process to accept the grant funds and execute grant agreements. Exact timing cannot be committed, but HUD is working diligently to get grant agreements and instructions prepared. Information will be sent both electronically and via postal service to the grantee contact on record.



# Competitive Grantees

**Q. I represent a HOPWA Competitive Grantee, and I want to know what should be in the “brief description of planned uses” document I send to the field.**

**A.** Prior to executing a grant agreement, each HOPWA competitive grantee is expected to submit to their respective Field Office a brief description of planned uses for the supplemental grant funds.

This brief description should be one or two pages long and list the type and amount of each eligible activity the grantee anticipates undertaking with the funding, a description of the process that will take place to carry out the work quickly, and 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.

Each grantee must also include a completed HOPWA budget form HUD-40110-B and completed forms SF-424 and SF-424D in its submission.

Grantees are also encouraged to provide a description of any identified immediate technical assistance needs.



# Communication

**Q: What types of communication are important to success of our program while we are trying to adapt to social distancing and community shut-downs?**

**A:** Communication with clients, landlords and the community should be an early priority! Let them know what you are doing and why. Letters, emails, website messages and direct calls will help provide information, transparency, and less uncertainty for all involved.

## Clients

- Provide information on COVID-19 and how they can stay safe.
- Explain why and how you are changing the way you interact with them and how the program is going to work during this time.
- Make sure clients know how to reach your program and how you will be reaching them.
- Let them know what additional services are available to help, if appropriate.
- Ensure that potential clients know where/how to reach agencies and apply.



# Communication

**Q: What types of communication are important to success of our program while we are trying to adapt to social distancing and community shut-downs?**

**A:** Communication with clients, landlords and the community should be an early priority! Let them know what you are doing and why. Letters, emails, website messages and direct calls will help provide information, transparency, and less uncertainty for all involved.

## Landlords:

- Provide information on how you are changing program procedures during the pandemic.
- Explain why and how you are changing the way you interact with them and how the program is going to work during this time.
- Explain how remote housing inspections will work and how some inspections will be delayed.
- Provide a brief fact sheet on remote inspections, especially for new landlords.
- Make sure landlords and property managers know how to reach your program.

# CARES Act Eligible Activities

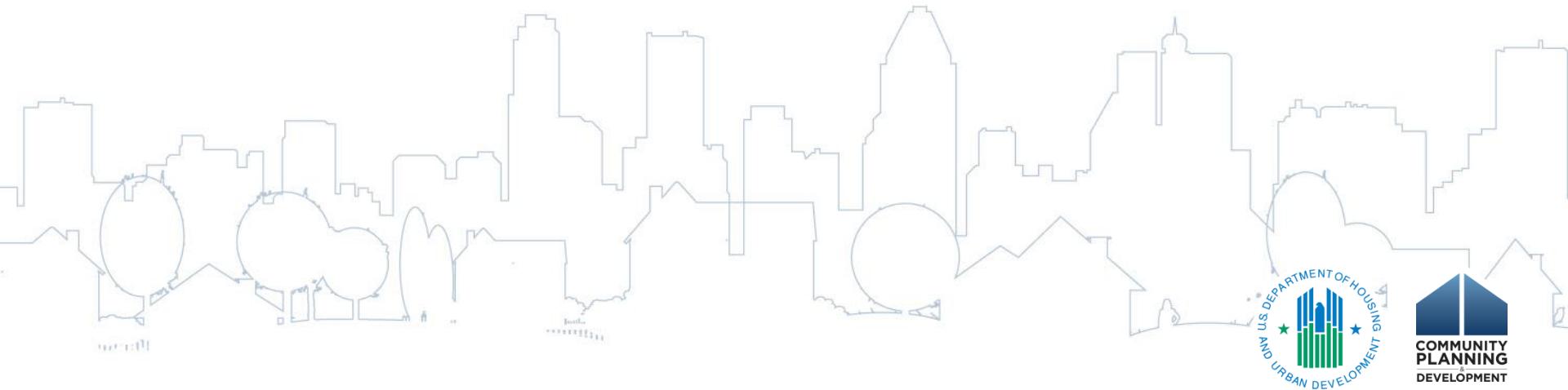
Specific COVID19-related Activities Covered by the CARES Act:

- Stays at **hotels, motels** or other locations to quarantine HOPWA-eligible individuals or their family members;
- Providing **transportation** services, including costs for privately-owned vehicle transportation to access medical care, supplies, and food or to commute to places of employment;
- Assisting households in **accessing essential services and supplies** such as food, water, medications, medical care, and information;
- Providing **nutrition services** in the form of food banks, groceries, and meal deliveries;
- Educating households on ways to **reduce the risk** of getting sick or spreading infectious diseases such as COVID-19 to others; and
- Costs related to **infection control measures** such as cleaning and disinfectant supplies, gloves and other safety-related supplies for staff and assisted households



# Q & A Review

Review of most-asked questions from the  
HOPWA AAQ through 4/20/2020



# Unit Inspection Requirements

**Q: Are TBRA unit inspections required now while we are under stay-at-home, shut-down or social distancing rules in our community?**

**A: Initial unit inspections prior to lease-up:** YES, initial inspections must be completed and the unit approved before a HOPWA-eligible household can move in. The 4/1/2020 regulatory waiver does allow physical (on-site) inspections to be delayed, but requires programs to use virtual methods to conduct these inspections. (See waiver language.)

**Annual reinspection of TBRA units:** NO, annual inspections may be temporarily delayed due to COVID-19 health and safety concerns.



# Unit Inspections: Initial

**Q: How do we proceed with conducting initial inspections remotely?**

- A: 1) Grantees must notify their FO that they wish to make use of the waivers, including the waiver on Property Standards for TBRA, at least 2 days before it will be used;
- 2) Develop policies & procedures outlining how virtual inspections should be carried out and documented, and discuss with all Sponsors delivering TBRA;
- 3) Maintain close communication with Sponsors to monitor for any difficulties or problem-solving needed!



# Unit Inspections: Initial

**Q: What is required for initial unit inspections based on the waiver?**

**A:** For a 1-year period beginning on the date of the waiver memo (3/31/2020), HOPWA grantees and project sponsors may delay in-person, on-site inspection of units for HQS normally required prior to providing TBRA assistance to HOPWA-eligible households (24 CFR 574.310(b)). In order to utilize this waiver, grantees and project sponsors must meet the following criteria:

- a. The recipient is able to visually inspect the unit using technology, such as video streaming, to ensure the unit meets HQS before any assistance is provided; and
- b. The recipient or subrecipient has written policies to physically reinspect the unit after the health officials determine special measures to prevent the spread of COVID-19 are no longer necessary.



# Remote Inspections

**Q: What methods are acceptable for remote inspections?**

**A:** Some suggested methods can include:

- Video streaming (such as FaceTime)
- Video recordings
- Time/date-stamped photographs

**What should be covered?**

- Show all areas of the unit
- Include a visual and audio (if possible) of smoke detectors
- Visual paint inspection when applicable



# Remote Inspections

**The on-site person doing videos (or other methods) could include:**

- Client or other household member
- Client caretaker
- Landlord or property manager
- Others as determined by the program/circumstances

**Program staff give directions and use results to complete a “provisional” inspection:**

Program staff should let the on-site person know what needs to be recorded, shown or photographed, then review the results and complete an inspection form for the record. Some new recommendations include that videos/pictures should be deleted afterwards and the inspection classified as "provisional", since you will need to re-inspect on-site at a later date.



# Unit Inspections: Annual

**Q: Can grantees/project sponsors postpone annual housing re-inspections due to COVID-19?**

**A:** Yes, grantees may postpone regular annual housing inspections due to COVID-19 health and safety concerns for their clients, staff and property owners. Annual re-inspections may continue, utilizing remote methods, if desired; however, this is not required.

Grantees should put a policy in place that addresses postponement of annual inspections due to COVID-19 health and safety concerns, detailing how delays can be approved, when inspections should resume and explaining when and how the policy will be consistently implemented.



# Unit Inspections: Annual

**Q: If we do not conduct annual inspections, are there other ways to ensure that units are safe?**

**A:** Yes, programs are encouraged to be creative in finding ways to check on clients and client housing conditions. Some suggestions include:

- Check in with clients about their unit conditions using a simple Habitability check-list.
- Ask clients to test smoke detectors.
- If conducting case management by phone, ask the client to FaceTime (if available) or take pictures of any problem areas.
- Note any unit concerns in the case record; relay any safety concerns to the LL.
- Make sure clients know they can call you with concerns about the unit even though inspections are delayed.



# Annual and Interim Recertifications

**Q: If we are delaying unit re-inspections, can we also delay annual client recertifications?**

**A:** No, annual and interim **recertifications should continue**, as usual, using remote methods. These are normal ongoing functions for rental assistance and may be even more important during this time when client income may be negatively impacted by income fluctuations and losses. To the greatest extent possible, programs should ensure that income losses in eligible households are taken into account through interim recertifications that allow for timely adjustment of the client rent portion.

Remember that self-certification of income can apply to recerts and the use of self-certification requires the waiver notification process!



# Signatures

**Q: Is there guidance on waiving of required signatures for clients that are eligible for HOPWA services?**

**A:** Grantees should look at all reasonable remote methods that will allow critical program activities to continue, including ways to temporarily bypass any local hard signature requirements. Remote methods to obtain signatures may include documents signed/scanned and emailed back to the program or the use of electronic signatures.

When these methods are not possible, programs may allow a client's verbal agreement to sign, documented by the program staff and placed in the client's file. Be sure to document these transactions carefully. Policies on remote methods, including verbal attestation of signatures, should be set by grantees, to be followed uniformly by their project sponsors.



# Self-Certification of Income and 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.



# Self-Certification of Income and HIV Status

**Q: What ramifications are there for our program if a project sponsor is unable to obtain a proper document to support eligibility on HIV status after the 3-months?**

A: If there are cases where source documentation verifying HIV status cannot be obtained within the required 3-month period, as would occur if the client is found not to be HIV+, the client will cease to meet HOPWA program eligibility, should be terminated and directed to other, non-HIV-specific program resources.

While HUD expects such cases to be rare, programs should nonetheless be prepared to take appropriate actions. Documentation throughout this time period should be placed in client records, stating clearly that the credible information on HIV status was accepted per the HOPWA waiver. With this documentation in place, Grantees and Project Sponsors providing HOPWA assistance to clients who ultimately are shown to be ineligible based on HIV status should not be subject to payback requirements.



# Stimulus Checks & Income

**Q: Should stimulus checks or the temporary \$600/week federal enhancement to unemployment insurance provided by the CARES Act be counted as income for determination of income eligibility for HOPWA programs and for determination of client portion of rent?**

**A:** At this time, COVID-19-related **stimulus funds** provided by the federal government should be considered as “temporary, nonrecurring, or sporadic income (including gifts)” and as such should be excluded as income when determining income eligibility and rent calculations for HOPWA.

However, HUD notes that **regular payments** of unemployment insurance (issued by the state) are treated as income, as is customary under program rules.



# FMR-Rent Standard for TBRA

**Q: What changes does the FMR Rent Standard waiver allow?**

A: The waiver of the FMR rent standard limit permits HOPWA grantees to establish rent standards, by unit size, that are reasonable, and based upon rents being charged for comparable unassisted units in the area, taking into account the location, size, type, quality, amenities, facilities, management and maintenance of each unit. Grantees are still required to ensure the reasonableness of rent charged for a unit in accordance with §574.320(a)(3).

Note: Programs would return all units to the current rent standard at the time of each client's lease renewal.

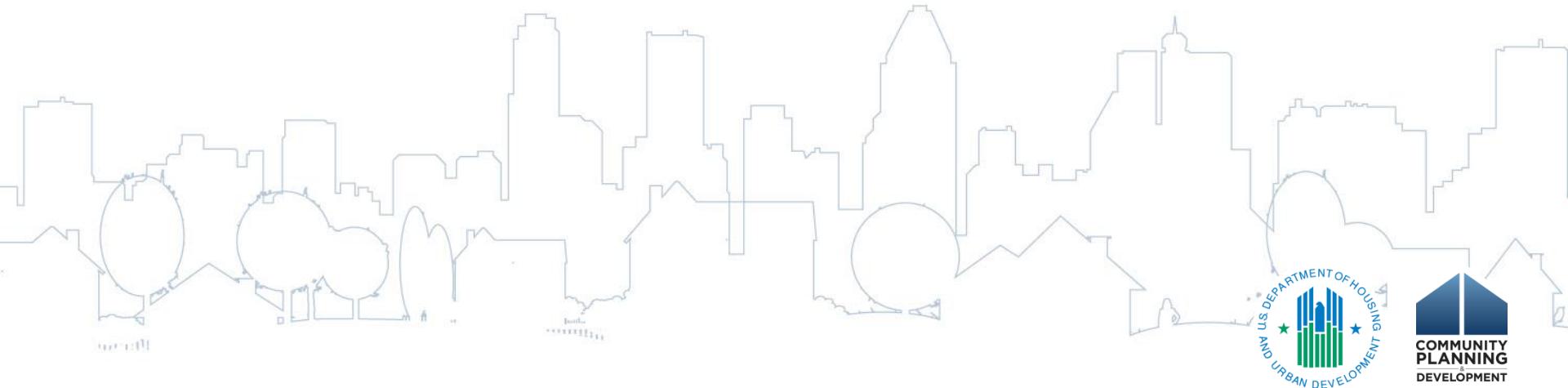


# FMR-Rent Standard for TBRA

**Q: One of the waiver provisions allows us to increase the rent standard for TBRA if needed as long as rents are still reasonable. Does this apply to Master Leasing programs?**

**A:** No, the current waiver only allows adjustments to FMR/rent standard for the HOPWA TBRA program.

**Note:** Additional waiver options are currently being assessed, so watch for future Notices and guidance.



# Hotel/Motel Stays

## Hotel/Motel Stays

- CARES Act funding may be used to pay for relocation services including lodging at hotels, motels, or other locations for eligible PLWHA as well as household members who are not living with HIV/AIDS.
- The funding may also be used to lodge one or more household members who may need to temporarily isolate from other members of the household.
- Members of households that currently reside in HOPWA-subsidized units are not precluded from receiving additional assistance for hotel/motel stays if isolation is needed.
- HOPWA program guidance recommends limiting hotel/motel stays to no more than 60 days in a six-month period. Assistance may be provided for a period exceeding this limit if there are COVID-19 related health and safety concerns for household members.
  - Grantees should have policies in place detailing how extensions can be approved and explaining when and how the policy will be consistently implemented.



# Hotel/Motel Stays

**Q: Can we begin providing hotel/motel vouchers right now even if that is not a HOPWA activity that was funded in the past? Can this be paid for through STRMU or PHP?**

**A:** Hotel/motel vouchers are only eligible through the Leasing line item and cannot be paid for through other activities such as STRMU or PHP. This type of short-term housing assistance is classified and reported as transitional facility-based housing costs for leasing the hotel/motel unit.

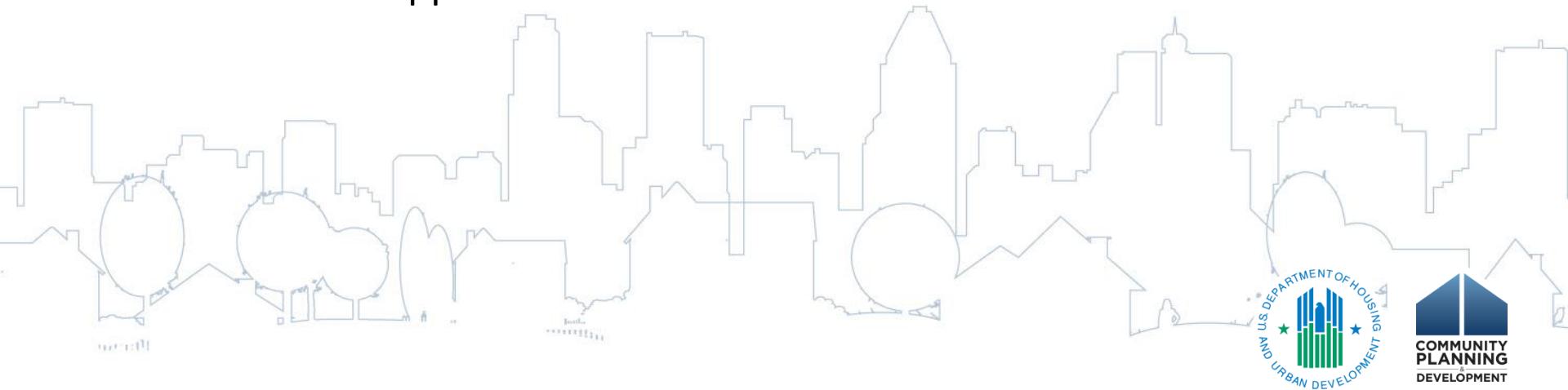
To use this temporary housing option, you must include it in the Consolidated Plan for your community as a planned HOPWA service. If your Con Plan does not currently include the provision of hotel/motel vouchers, it will be necessary for you to amend the Plan prior to implementing this as a new HOPWA activity.



# Hotel/Motel Stays

**Q: We are already providing hotel rooms now to help clients and household members isolate. Can those costs be reimbursed later from the new CARES Act award?**

**A:** The new CARES Act funding can cover or reimburse allowable costs incurred by a grantee or project sponsor for allowable activities to prevent, prepare for, and to respond to the COVID-19 pandemic regardless of the date on which such costs were incurred. IDIS guidance will be provided on how to accommodate this, and how to track the approximate cost dates.



# Hotel/Motel Funding

**Q: We would like to be able to provide hotel/motel stays, but we see STRMU as a greater need in our community. Are there other resources we can use to access hotel/motels?**

**A:** With new CARES Act funding coming into communities across the country, there may be alternative payers for hotel/motel stays in your community. It is important to coordinate with other programs, as much as possible, to ensure that your clients needs are met without being duplicative in services.

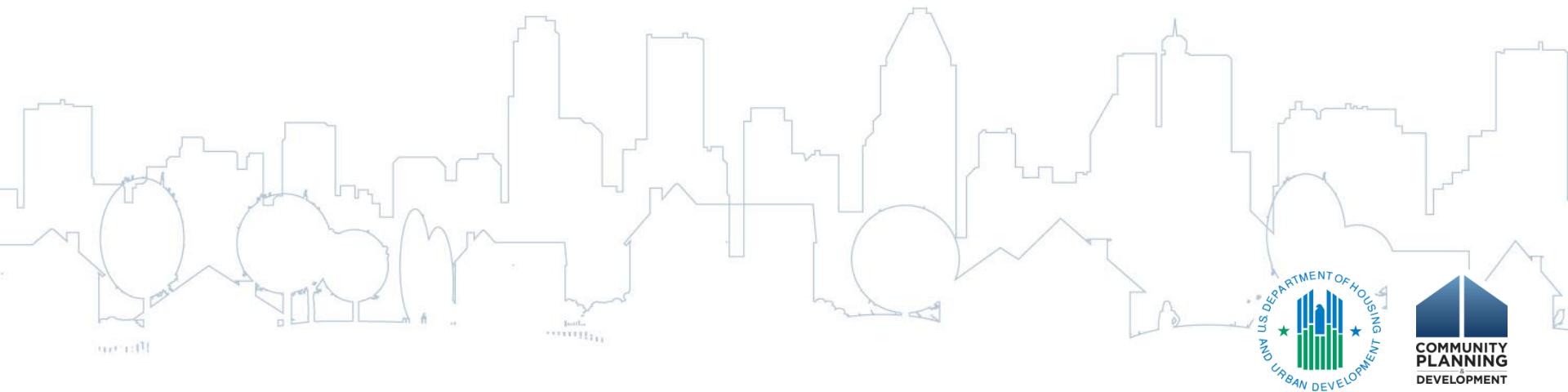
Other programs that may be able to pay for hotel/motel stays during this COVID-19 response period are: Ryan White, ESG (Emergency Solutions Grant), FEMA funding, and even local United Way agencies.



# STRMU Extensions

**Q: Will HUD allow extension of STRMU assistance beyond the 21-week limit due to increased needs during the COVID-19 emergency?**

**A:** The CARES Act provisions allow extension of STRMU for up to 24 months. Currently, this extension applies only to the additional HOPWA funding provided in the Act. A Notice explaining the CARES Act provisions for HOPWA is expected to be released soon.



# 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.



# 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.



# Protective Supplies

**Q: Can HOPWA funds be used to purchase protective supplies (e.g., protective masks, hand sanitizer, and sterilizing wipes) for eligible clients? If so, would it be under support services?**

**A:** Yes, CARES Act funding may be used for costs related to infection control measures such as cleaning and disinfectant supplies, gloves and other safety-related supplies for assisted households. Such supplies may be charged to supportive services. Additionally, these supplies may be charged to Operations when provided to staff and residents in facility-based housing.

The grantee should have policies in place that include key elements such as:

- 1) documentation of efforts to show that no alternate sources are available;
- 2) explanation of the specific types of supplies that are needed by clients;
- 3) description of who may receive such supplies and in what quantity; and
- 4) how the program should ensure that all clients identified as in need will be treated equally.



# Laptops, Software, Cell Phones

**Q: Can we purchase items like laptops and software to help our staff carry out housing and support services remotely?**

**A:** Programs should be able to purchase laptops and software programs as long as the costs are consistent with the Uniform Administrative Requirements at 2 CFR 200.

Items such as laptops, cell phones, tablets, and computer programs may be purchased when needed to conduct eligible HOPWA activities. If these supplies are used for multiple HOPWA activities (STRMU, TBRA, Supportive Services, Admin etc.), or delivery of non-HOPWA programs, the costs must be pro-rated based on the amount of time that the supplies are used for each activity.

Note: Competitive HOPWA grantees will need to seek a budget/contract amendment if these are not approved costs in their award. Formula grantees can approve these costs for HOPWA activities that are currently funded and listed in their Con Plan.



# Cell Phones – Guidance in Development

**HOPWA allow purchase of cell phones and wireless service plans for clients to use when receiving supportive services?**

- Purchase of cell phones and wireless service plans for clients when needed to facilitate ongoing case management may be allowed as a supportive service expense.
- Certain requirements would apply. For instance, the cell phone would be owned by the sponsor and the wireless service plan would be the sponsor's, but the phone could be loaned to program participants as needed to enable provision of supportive services necessary to obtain and retain housing, such as case management, mental health services.
- 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.

**Specific guidance is in development, so stay tuned**



# 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:

- **Non-HOPWA 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.



# 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

### HOPWA Ask A Question (AAQ) Portal

In Step 2 of the question submission process, select “HOPWA: Housing Opportunities for Persons With AIDS” from the “My question is related to” drop down list and write “Health Preparedness and Response” in the subject line



# Resources Continued

## Disease Risks and Homelessness Webpage on the HUD Exchange

Guidance and resources from HUD and Federal Partners related to COVID-19 and persons experiencing homelessness

## HHS Interim Guidance for COVID-19 and Persons with HIV

Special considerations for persons with HIV and their health care providers regarding COVID-19

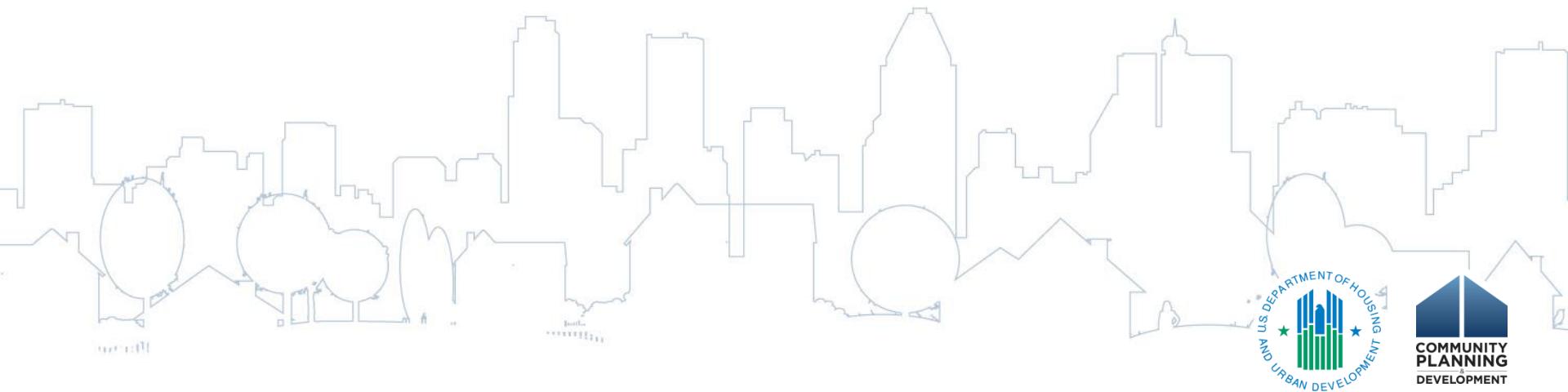
## HIV.gov Webpage on Coronavirus (COVID-19) and People with HIV

## Novel Coronavirus (COVID-19) Frequently Asked Questions for Ryan White HIV/AIDS Program Recipients and Partners



# Technical Assistance

Grantees in need of TA related to COVID-19 should submit a TA request via the “Request Program Assistance” webpage on the HUD Exchange portal:  
[https://www.hudexchange.info/program-support/technical-assistance/.](https://www.hudexchange.info/program-support/technical-assistance/)



# Questions

