

HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA)

Short-Term Rent, Mortgage, and Utility (STRMU) Assistance



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1. Overview

1.1 Purpose

This document offers guidance for providing Short-Term Rent, Mortgage, and Utility (STRMU) assistance under the Housing Opportunities for Persons With AIDS (HOPWA) program. STRMU assistance is designed to prevent homelessness of individuals and families by helping them remain in their own dwellings and increasing their access to supportive services. The information presented here defines the eligibility for STRMU assistance, outlines the use of HOPWA funds for STRMU, describes methods to determine the eligible period of assistance, and explains the waiver process.

The U.S. Department of Housing and Urban Development (HUD) Office of Community Planning and Development (CPD) developed this material with Victory Programs, Inc., and made it available online on the HUD Exchange website. A grantee that determines corrective action is needed to comply with this information should take all necessary steps to correct the matter as soon as practical and may seek HOPWA technical assistance as needed. Grantees and project sponsors may submit questions regarding this information to the HUD Exchange Ask A Question help desk. If additional assistance is needed, grantees may submit a request for technical assistance via the HUD Exchange website.

HUD Exchange – Ask A Question Help Desk

<https://www.hudexchange.info/get-assistance/my-question/>

HUD Exchange – Request Technical Assistance

<https://www.hudexchange.info/technical-assistance/>

1.2 Authority and Funding

Section 858 of the AIDS Housing Opportunity Act (“Act”), 42 U.S.C. 12907, authorizes the use of Housing Opportunities for Persons With AIDS (HOPWA) funds for Short-Term Rent, Mortgage, and Utility (STRMU) payments to prevent the homelessness of a tenant or mortgagor. The U.S. Department of Housing and Urban Development (HUD) Office of Community Planning and Development (CPD) administers the HOPWA program through the Office of HIV/AIDS Housing (OHH) and local HUD Field Offices. The HOPWA regulations implementing STRMU are found at 24 CFR 574.300(b) and 24 CFR 574.330.

1.3 HOPWA Program and STRMU Assistance

The objective of the HOPWA program is to address the housing needs of low-income persons living with HIV/AIDS and their families. STRMU is one type of HOPWA housing assistance, along

with Tenant-Based Rental Assistance (TBRA); Project-Based Rental Assistance (PBRA); Permanent, Emergency, or Transitional Housing Facilities; and Permanent Housing Placement (PHP). HOPWA also funds Supportive Services to address needs and improve access to care for assisted households. Grantees should consider how to best make use of the variety of HOPWA eligible activities, found at 24 CFR 574.300(b), to address community needs.

The goal of STRMU assistance under the HOPWA program is to provide short-term, stabilizing interventions to HOPWA eligible households experiencing a financial crisis as a result of their HIV/AIDS health condition or a change in their economic circumstances. STRMU assistance is a preventive housing intervention intended to reduce the risks of homelessness, and when utilized together with other HOPWA efforts, including access to health care services, case management, benefits counseling, and employment or vocational services, works to stabilize assisted households.

HUD seeks to foster long-term solutions to housing instability for households receiving time-limited housing assistance. Stand-alone STRMU assistance payments are likely to create only a temporary solution for an unstable living arrangement unless connected to a long-term housing stabilization plan. Grantees are encouraged to coordinate related housing efforts to assess the on-going housing needs of these households and provide access to other permanent housing options for HOPWA-eligible persons and their families as appropriate.

Individual housing and services plans include an assessment of the household's current resources and establishment of longer-term goals for the assisted household. When appropriate, these goals should involve efforts to restore self-sufficiency, develop job skills necessary for gainful employment, access public benefits, and/or enhance educational attainment, vocational rehabilitation, or life skills needed for future independence from housing support. Individual housing and services plans also serve as documentation that grantees and project sponsors have met the requirement for on-going assessments of housing assistance and supportive services, as required under 24 CFR 574.500. Section 3.4 provides further discussion on individual housing and services plans.

1.4 Confidentiality

The provision of HOPWA assistance involves information on the HIV/AIDS status of individuals for the purpose of determining program eligibility. Such information is subject to confidentiality requirements, as mandated by Section 856 of the AIDS Housing Opportunity Act. The implementing HOPWA regulation, as set forth at 24 CFR 574.440, states the following:

“The grantee shall agree, and shall ensure that each project sponsor agrees, to ensure the confidentiality of the name of any individual assisted under this part and any other information regarding individuals receiving assistance.”

Consistent with statutory and regulatory requirements, grantees and project sponsors must ensure that information is used for the limited purpose of establishing program eligibility. HIV/AIDS status, along with related client eligibility documentation, should only be accessible by qualified individuals who determine eligibility, provide support, or oversee the provision of this federal assistance. Grantees must have written procedures and training efforts in place to maintain confidentiality. Additional guidance on this requirement and suggested best practices can be found in the *HOPWA Confidentiality User Guide* via the link below.

HOPWA Confidentiality User Guide

<https://www.hudexchange.info/resource/3296/hopwa-confidentiality-user-guide/>

2. Eligibility and Documentation

2.1 STRMU Eligibility Criteria

STRMU is designed as a short-term, needs-based intervention to prevent homelessness. As such, potential STRMU households must meet all three of the following criteria in order to receive STRMU assistance:

- 1) A household must meet the two basic HOPWA program eligibility criteria:
 - a) A household must have at least one person verified to have an HIV or AIDS diagnosis; and
 - b) The total household income must be at or below 80 percent of the area median income (AMI), as defined by HUD.
- 2) A household must have legal residency in housing and/or be responsible for utility payments.
- 3) A household must demonstrate need for the assistance.

The three eligibility criteria for HOPWA STRMU assistance, including basic program eligibility (diagnosis and income), legal residency in housing, and demonstrated need are described in more detail in the following sections.

Grantees may impose additional eligibility criteria for their HOPWA programs, but the criteria for HOPWA eligibility established by law is limited to the diagnosis and low-income threshold described above. Some communities make eligibility requirements more restrictive due to such factors as a limited amount of HOPWA resources and a need to integrate HOPWA program

support with other efforts to help address the most pressing HIV/AIDS housing needs in the community. To establish additional restrictions and/or target HOPWA funding in ways not required by law, formula grantees must identify such needs in their Consolidated Plan and Annual Action Plan process, which includes consultations with the local community and requests for public comment. Competitive grantees must include such criteria in their grant application and final grant agreement with HUD. HUD permits the use of local preference as a means of prioritizing benefits to those who are most needy. "Local Preferences" must be approved through HUD's Office of Fair Housing and Equal Opportunity (FHEO) to ensure that such practices do not discriminate or inadvertently exclude any persons either by design or omission.

2.2 HIV and Low-income Status

To receive STRMU assistance, a household must meet the HOPWA program eligibility criteria. The HOPWA regulation defines an eligible person as "a person with acquired immunodeficiency syndrome or related diseases who is a low income individual ... and the person's family" (24 CFR 574.3). The term "family" is defined as "one or more eligible persons living with another person or persons, regardless of actual or perceived sexual orientation, gender identity, or marital status, who are determined to be important to the eligible person or person's care or well-being, and the surviving member or members of any family described in this definition who were living in a unit assisted under the HOPWA program with the person with AIDS at the time of his or her death" (24 CFR 574.3). Low-income is measured by household income at or below 80 percent of the area median income (AMI), as defined by HUD.

A household whose sole member living with HIV/AIDS is a minor is eligible for STRMU assistance. In this situation, written verification indicating that an adult member of the household has legal custody of the minor child must be obtained and maintained in the file and the entire household income must be taken into consideration for purposes of income eligibility. The minor child must reside in the household at least 51 percent of the time. In this situation, the adult would be considered the head of household of the family, but the minor child is the eligible person that qualifies the entire household for assistance.

HOPWA grantees and/or project sponsors must maintain documentation that the eligible person receiving assistance is HIV positive or has a diagnosis of AIDS, as determined by a health professional competent to make such a determination. Sufficient documentation evidencing such determinations includes documentation resulting from appropriate HIV tests administered by a physician's office, HIV counseling center, or community health center.

Documentation must also confirm that the eligible person and his/her family have a household income that is at or below 80 percent of area median income, as published by HUD on an annual basis. Documentation must include periodic updates to income information. HUD's CPD Income Eligibility Calculator is available to assist HOPWA grantees and project sponsors in determining and documenting household income eligibility. Links to these resources are provided below.

CPD Income Eligibility Calculator

<https://www.hudexchange.info/incomecalculator/>

HUD Program Income Limits

<http://www.huduser.org/portal/datasets/il.html>

2.3 Housing Status

Eligible STRMU households must be residing in housing where they are either a tenant or mortgagor. STRMU assistance is designed to help homeowners and renters remain in their current residence. As such, STRMU assistance may not be provided to assist homeless households or households moving into a new housing arrangement.

STRMU assistance may be provided in shared housing arrangements where two or more unrelated households live together. If a grantee allows STRMU assistance for households in shared housing arrangements, policies should be developed that provide guidance on how the program will be implemented. In shared housing situations, only the assisted individual's income, not the entire household income, would be included in income and assessment calculations.

STRMU assistance can be used to assist eligible individuals who have a lease naming them as a tenant, but who live with an adult family member if one of the following two conditions is met:

1. The eligible person lives with an adult family member and the entire household is assisted. In this case, all household income is included, and the entire household meets the HOPWA low-income eligibility guidelines and STRMU evidence of need requirements.
2. The eligible person is renting a unit/room from an adult family member and a "reasonable accommodation" is determined necessary for the client. Due to the reasonable accommodation determination, the family's income is not counted in determining the eligibility of the person living with HIV/AIDS for STRMU assistance payments. More information on reasonable accommodations can be found in Section 2.5.

2.4 Evidence of Need

STRMU assistance is needs-based and intended to benefit HOPWA eligible households that are experiencing a financial crisis arising from their HIV/AIDS health condition or a change in economic circumstances. To be eligible for STRMU assistance, households must demonstrate that they do not have the resources to meet their rent, mortgage, or utility costs and that they would be at risk of homelessness in the absence of STRMU assistance.

When a household is unable to make payments for monthly housing costs, STRMU assistance may be used for costs that are not covered or reimbursed by other available resources. STRMU providers are responsible for verifying and documenting a participating household's inability to make required housing payments. The STRMU provider should assess that the household's needs are for actual costs, that other resources such as household income are not reasonably available to pay the housing costs, and that STRMU assistance will alleviate the payment delinquency so as to avoid the eviction and result in, at least, temporary stability for that household. The STRMU provider should also ensure that the household's on-going housing needs are assessed in connection with the development of an individual housing and services plan for the household.

STRMU providers should establish a reasonable basis to quantify and verify the need for STRMU assistance. Examples include:

- A record of actual monthly bills for recurring costs, and evidence of the limited nature of household income along with limited available financial resources (i.e. balance on bank accounts).
- A case manager's assessment of "need" which includes a variety of elements such as current, previous, and future month's financial situation, employment and benefits status, and HIV/AIDS health-related conditions.

A household budget review of these costs and assessment of inability to meet such costs should be completed by a housing case manager and documented in the household's file.

Documentation in the form of a default/late payment notice is not required to demonstrate housing need. A late payment notice is only one of the methods that can be used to evidence a household's need for STRMU assistance. Other ways to verify need and amounts owed include documentation of utility, mortgage or rent payments due and/or calls to the utility company, landlord, or mortgage company prior to a late payment notice being issued, which could potentially help avoid added late fees as additional costs.

2.5 Reasonable Accommodation

HUD regulation 24 CFR 982.306(d) does not allow housing assistance to a unit if the owner is the parent, child, grandparent, grandchild, sister, or brother of any member of the family, unless it is determined that approving the unit would provide “reasonable accommodation” for a family member who is a person with disabilities. A reasonable accommodation would permit a “person with disabilities” including persons living with HIV/AIDS to receive benefits when housed with a family member who owns or rents the housing unit if it is determined by a physician that living with the family member is important to the client's overall health and well-being.

In such situations, due to a reasonable accommodation determination, the family's income is not counted in determining the eligibility of the low-income person with disabilities for STRMU assistance. Assistance payments are based on the number of bedrooms that the person(s) with disabilities occupies in the home, must be reasonable for the type and nature of the housing arrangement, and similar to reasonable rental fees available in comparable unassisted units.

3. Eligible Use of Funds

STRMU eligible households may receive financial assistance in the form of rental assistance, mortgage assistance and/or utility assistance. Tenant households may receive rental assistance and/or utility assistance. Mortgagor households may receive mortgage assistance and/or utility assistance.

3.1 Rental Assistance

To be eligible for rental assistance, households must have a legal right to reside in the unit and prove responsibility for paying the rent. Satisfactory evidence of tenancy includes a lease naming the tenant as the leaseholder or an eligible household occupant, or a default/late payment notice that identifies the eligible person or a resident member of the family as a named tenant under the lease. As a general matter, if the eligible person is not named on a valid lease either as a tenant or an authorized occupant, the person has no legal right to reside in the unit and is therefore not eligible for STRMU assistance.

While an oral lease for less than a year may be valid in some states, most states require a written lease to establish a legal tenancy and HOPWA adopts this clear standard. This position is also consistent with other HUD rental assistance programs, which require such documentation (e.g., HOME, CoC, Housing Choice Vouchers). As a practical matter, not requiring a written lease for households in rental situations may leave grantees in a vulnerable position in documenting STRMU assistance payments during audits and reviews.

3.2 Mortgage Assistance

To be eligible for mortgage assistance, the eligible person must demonstrate that he/she is the resident owner of mortgaged real property. Satisfactory evidence of ownership of encumbered property includes: a deed accompanied by a mortgage or a deed of trust; a mortgage or deed of trust default/late payment notice which identifies the eligible person or a resident member of the family as the property owner/debtor; or, a valid, currently-dated title insurance policy identifying the eligible person or a resident member of the family as the property owner/debtor. STRMU providers should complete a careful assessment and an individual housing and services plan (see Section 3.4) to determine that a household is able to maintain payments on mortgages after the short-term eligible STRMU period ends.

STRMU mortgage assistance payments may include costs for property taxes, insurance, and condo fees in some situations. Most homeowners are required to pay property taxes, mortgage insurance premiums, and/or fire and hazard insurance premiums as part of their monthly mortgage payment. For example, the Federal Housing Administration (FHA) requires that a homeowner's monthly payment include property taxes, special assessments (if applicable), flood insurance (if applicable), and fire or other hazard insurance premiums in addition to principal and interest (see 24 CFR 203.22 through 203.24). These additional charges are held in escrow for payment by the lender on behalf of the homeowner. Other forms of financing allow a mortgagor to pay for taxes, insurance, and condo fees separately. For the purposes of STRMU assistance, to the extent that taxes, insurance, condominium fees, or other building operation costs are included in the monthly mortgage payment either by federal regulation or the terms of the mortgage, these expenses are eligible to be included in STRMU mortgage assistance payments. STRMU mortgage assistance for taxes, insurance, or condo fees that are not included on the monthly mortgage statement are, therefore, not eligible.

Other forms of assistance, such as homeownership programs, may provide alternative forms of support for costs not included on the mortgage payment statement. Alternatively, grantees may limit the mortgage assistance payments to only the principal and interest payments if the grantee would like to adopt a local standard that gives every recipient of its program the same level of assistance, irrespective of whether other escrow items are included in the borrower's mortgage payment statement. Section 4.5 discusses capped payments in more detail.

STRMU mortgage assistance payments may include costs related to second mortgages. As a general matter, a second mortgage represents a lien on real property. Defaults on mortgages (e.g., nonpayment of loan(s), lapsed insurance, unpaid property taxes, among others) may lead residents to foreclosure and eviction. STRMU assistance provides short-term mortgage

payments regardless of priority (i.e. the first or second mortgages) to eliminate the threat of homelessness for an adequately housed eligible person.

3.3 Utility Assistance

To be eligible for utility assistance, an applicant must reside in the unit legally and have an account in his/her name with a utility company or proof of responsibility to make utility payments, such as cancelled checks, money orders, or receipts in their name from a utility company. Individuals who have prior criminal histories, poor credit or lack of rental history often do not have utility accounts in their name; however, they may be responsible for paying these housing expenses. Such households must demonstrate proof of responsibility to make such payments by documenting a history of making payments and should not be excluded from receiving STRMU assistance based on the utility account not being in their name.

3.4 Individual Housing and Services Plan

STRMU providers must document the appropriateness of providing STRMU assistance for each assisted household. Ongoing assessment of the housing assistance and supportive services is required by 24 CFR 574.500. These requirements should be met through a housing needs assessment and the development of an Individual Housing and Services Plan for each STRMU assisted household.

The housing needs assessment is intended to provide information to help achieve housing stability and is an opportunity to collect as much information as possible about the household's needs, preferences, and challenges. This information helps inform the development of an Individual Housing and Services Plan and the services that are subsequently provided.

The Individual Housing and Services Plan should document a household's goals for housing, identify resources and services needed to achieve those goals, outline what assistance will be delivered and who will deliver it, and include an estimated timeline for achieving goals. All Individual Housing and Services Plans should be developed collaboratively between a household and case manager or other appropriate staff person.

For more information, the *HOPWA Rental Assistance Guidebook* provides an in-depth discussion on developing Individual Housing and Services Plans in Chapter 3 and also includes a sample template.

HOPWA Rental Assistance Guidebook

<https://www.hudexchange.info/resource/2818/hopwa-rental-assistance-guidebook/>

3.5 Suitable Housing Units

As part of the assessment process for STRMU, providers should ensure that housing supported with STRMU assistance is safe, decent, and sanitary. In order to expedite payment and prevent homelessness, a housing quality standard inspection is not required initially for the use of time-limited STRMU assistance. However, HUD strongly recommends that continued occupancy of any HOPWA-supported housing meet HOPWA's habitability standards found at 24 CFR 574.310(b)(2) and that any observed deficiencies noted in an individual housing and services plan are addressed appropriately. If providers assess that a STRMU applicant or assisted household is residing in substandard housing, the individual housing stability plan should seek to address any unit deficiencies or move the client to housing that meets HOPWA's habitability standards and is in compliance with all applicable State and local housing standards.

Lead-based paint requirements do not apply for STRMU assistance when:

- The STRMU assistance is lasting 100 or fewer consecutive days;
- The assisted unit is a zero-bedroom unit;
- The household does not have members who are pregnant or are children under the age of six; or
- The housing was built in 1978 or after.

Lead-based paint requirements do apply for STRMU assistance when:

- The STRMU assistance is lasting more than 100 consecutive days;
- The housing was built before 1978; and
- The household has members who are pregnant or are children under the age of six.

If lead-based paint requirements apply, then before STRMU assistance can be provided for that unit:

- A visual assessment for deteriorated paint must be done for the unit, the common areas servicing the unit, and the exterior surfaces of the building where the unit is located.
- Staff must complete an hour-long online training course before they are allowed to perform visual assessments.
- If deteriorated paint is identified by the visual assessment, it must be repaired along with the building component underneath the surface finish, if that component is defective, and, unless the amount of deterioration is below a specified threshold, the repair work must be done using lead-safe work practices and the affected area tested and "cleared" to allow safe occupancy
- Residents must be provided a lead hazard information pamphlet and a notice regarding the deteriorated paint work and clearance results.

- The grantee must determine whether the cost of the deteriorated paint work should be paid by the owner/developer, the grantee, or both, based on State and local laws.

After STRMU assistance has been provided:

- Ongoing lead-based paint maintenance must be incorporated into regular building operations.
- If any additional deteriorated paint is addressed, additional notice to residents is required.

For additional guidance, see the *HOPWA Rental Assistance Guidebook*, Chapter 5.

HOPWA Rental Assistance Guidebook

<https://www.hudexchange.info/resource/2818/hopwa-rental-assistance-guidebook/>

HUD Lead-Based Paint Visual Assessment Training Course

<http://www.hud.gov/offices/lead/training/visualassessment/h00100.cfm>

STRMU assistance can be provided to households who live in mobile homes, trailers, and motor homes, in some situations. STRMU assistance payments are permitted in accordance with guidance established for the HOME Affordable Housing program in HUD CPD Notice 03-05. As described in Notice 03-05, mobile homes, motor homes, trailers, recreational vehicles, and other like vehicles with wheels on the ground, capable of relocating and not attached to the earth, are considered personal property and therefore are not eligible for STRMU assistance. HOME guidance considers units attached to the earth as "real" property (as in real estate). Such units must also be connected to permanent utilities and meet local guidelines for mobile home housing. Households residing in attached real property mobile homes, that are connected to utilities, and meet local guidelines, are eligible to receive STRMU assistance. Space rental costs in a mobile home park are allowable STRMU assistance costs.

3.6 Ineligible Costs

STRMU assistance cannot be provided to households receiving rental assistance for the same period of time from HOPWA or another federal, state, or local housing assistance program. For example, a household with a Housing Choice Voucher (commonly referred to as a Section 8 voucher) or other type of rental assistance is not eligible for STRMU assistance to cover the portion of the rent that the household is responsible to pay.

STRMU assistance is established in statute to prevent a household from becoming homeless and, therefore, can only be used to prevent eviction from or the loss of a housing unit that is

occupied by eligible persons. Accordingly, STRMU can only be used to assist someone currently in housing as an intervention to prevent homelessness. STRMU assistance cannot be provided to a household that is homeless. STRMU assistance may not be provided to assist households in moving into a new housing arrangement. STRMU assistance may not be used for moving assistance, security deposits, or first month's rent.

In addition, STRMU mortgage assistance may not be used for the following activities: support for an open line of credit or loan that was secured by the house; taxes and insurance paid separately after the first or second mortgage is paid in full; assistance for payment towards personal loans or credit debts secured against the unit; assistance for a second mortgage when the first mortgage payments are not current; or down-payment assistance to support purchase of new unit.

Furthermore, household supplies, furnishings, automobile/transportation, and basic phone service costs are not eligible under STRMU. In some situations, a grantee may determine that their HOPWA programs will allow reasonable costs for basic phone services that are determined necessary to assist a household in accessing services, such as maintaining consistent and accurate participation with medical treatment protocols, care or other essential supportive services as an eligible cost under HOPWA Supportive Services. As an additional consideration for rural or small population areas, these HOPWA Supportive Service costs may involve reasonable costs for long-distance services, if needed, for connecting clients to this available support.

3.7 Fraudulent Information

Providing false information to the government when applying for "federal public benefit programs" is unlawful; for more information see Program Fraud Civil Remedies Act of 1986, 31 U.S.C. 3801-3812. Grantees are encouraged to contact their legal counsel and local HUD Field Office for guidance in addressing potential fraud by a HOPWA assisted household. It is recommended that project sponsors maintain a fraud policy for their HOPWA program. In some cases, termination may be necessary. The HOPWA regulations provide guidance on terminating assistance at 24 CFR 574.310 (e)(2).

4. Eligible STRMU Period and Payments

4.1 Eligible STRMU Period

The HOPWA statute and related regulations place limitations on the length of time clients may receive STRMU assistance. The "eligible STRMU period" is limited to no more than 21 weeks in any 52-week period. STRMU assistance may not be provided for costs accruing during a period

of time that exceeds the 21-week period. STRMU providers are, therefore, required to examine the periods of time covered by rent, mortgage, and utility costs to assure that assistance is not provided in excess of the eligible STRMU period.

4.2 Defining the Eligible STRMU Period

The start and end date of the eligible STRMU period may be defined using one of two methods described below. HOPWA grantees must select one of these methods and ensure that the selected method is applied consistently by all funded project sponsors and for all participating households. STRMU providers must consistently use the same method to define when the eligible STRMU period begins and ends.

One method is to set a fixed 52-week period for all households. This fixed period can be based on one of the following: the grantee's operating year, which is defined in the HUD-approved Consolidated Plan and used for annual reporting to HUD for formula grantees; the operating year established under the grant agreement with HUD for competitive grantees; or, the calendar year, which begins on January 1 and ends on December 31.

A second method is for STRMU providers to establish a unique eligible STRMU period for each individual household based on the time period covered by the STRMU assistance. Using this method, the eligible STRMU period begins on the date that the STRMU assistance is first provided. The eligible STRMU period for a household would end 52 weeks after the first STRMU benefit started accruing. At the end of this 52-week period, the next eligible STRMU period would begin for that household. For example, the eligible STRMU period for a household that receives STRMU rent and utility assistance on April 1 for rent due on April 1 and a current utility bill due April 5, would begin on April 1 and end on March 31 of the following year. If that same household also had a utility bill in arrears for a period time prior to April 1, the eligible STRMU period begins on the earliest date that the assistance covers.

4.3 Counting the Eligible STRMU Period

All STRMU assistance costs may be equated to the actual calendar days of assistance provided; however, HOPWA allows other acceptable methods for equating and tracking the eligible STRMU period as most housing costs are on monthly billing cycles. The three acceptable methods are described below. The purpose of allowing multiple methods is to allow grantees to establish procedures that will best meet their local needs. Once a grantee selects the method it intends to use for calculating the maximum allowable eligible STRMU period, the grantee must use that particular method and/or ensure all project sponsors use that particular method.

Method 1: Calendar Days of Assistance

This method is based on counting the actual days for which housing and/or utility payments are made on behalf of the STRMU-assisted household. The limit of 21 weeks is counted as 147 days of assistance in the year.

Example

If a total utility bill was paid and the service period was April 17-May 16, 14 days would be attributed to April and 16 days to May for a total of 30 days of assistance.

Example

If a portion of the utility bill was paid, the days would be counted based on the amount that was paid by STRMU. For example, the total bill for April 17-May 16 (30 days) is \$148.00 and the STRMU provider pays \$100 of utility assistance. To calculate the days of assistance, divide \$148 by 30 days, which equals \$4.93 per day. Then, divide the \$100 payment by \$4.93 per day, which equals 20.3 days. With rounding, this utility assistance counts as 20 days.

Method 2: Rounding a Month to Four Weeks

This method rounds each month to four weeks for up to 21 weeks of assistance. Rental and mortgage costs generally cover a calendar month period consisting of slightly more than four full weeks. Rounding each calendar month to four weeks allows for five months and one week of assistance to equal the 21-week limit, regardless of the number of days in those months.

Example

A rental period of June 1-June 30 is rounded down to four weeks. If payment was made for 75 percent of a month's rent, it would count as three weeks; 50 percent of a month's rent would count as two weeks, and 25 percent of a month's rent would count as one week. If the monthly rent is \$1,000, assistance payments would count as follows: \$1,000 of assistance counts as four weeks, \$750 of assistance would count as three weeks, \$500 of assistance would count as two weeks, and \$250 of assistance would count as one week.

Monthly utility service periods generally do not coincide with rent or mortgage payment periods, rather they typically span parts of 2 calendar months (e.g. May 7-June 6). When providing utility-only assistance, the utility service period is counted as four weeks of STRMU assistance.

Example

A utility period of May 7-June 6 is counted as four weeks. If STRMU assistance covered 75 percent of the total cost of the utility bill, it would count as three weeks; 50 percent

of a utility bill would count as two weeks; and 25 percent of a utility bill would count as one week.

If STRMU assistance is provided to cover both a housing bill and utility bill but the dates of service do not coincide, the eligible STRMU period would be calculated as follows: Count the overall assistance as four weeks of assistance (one month rounded to four weeks) if at least 14 days of the utility period coincide with the rent/mortgage period. If less than 14 days of the utility bill and rent/mortgage period coincide, count the remaining portion of the utility period as the next month of assistance for tracking purposes.

Example

Assistance is provided for a rental period of May 1-31 and is rounded down to four weeks. The utility period of May 7-June 6 results in 25 days coinciding with the rental period; therefore, a total of four weeks is counted in May for the payment of both rent and utilities.

Example

Assistance is provided for a rental period of May 1-31 and is rounded down to four weeks. The utility period of May 20-June 19 results in 12 days coinciding with this rental period and 19 additional days. Because less than 14 days of the utility period and the rental period coincide, the remaining 19 days of the utility period must be counted as additional weeks of assistance. The 19 days are rounded up to count as three weeks of assistance. This rental and utility assistance counts as a total of seven weeks of assistance.

Method 3: Counting Full and Partial Weeks

This method tracks the 21 weeks of assistance by calculating a number of weeks in a month. For this method, divide 52 weeks per year by 12 months. The result, when rounded, equals 4.3 weeks per month. A full month's rent would be count as 4.3 weeks; 75 percent of a month's rent would counts as 3.2 weeks; 50 percent of a month's rent would count as 2.2 weeks; and 25 percent of a month's rent would counts as 1.1 weeks of assistance.

4.4 Amount of Assistance

Although STRMU assistance does not require the client to pay a portion of the rent or utility bill, STRMU assistance must not be used to relieve the household's responsibility to make housing payments in the absence of inability to pay. If a household is capable of paying some of their rent, mortgage, and/or utility costs, STRMU providers may determine an appropriate household contribution amount. Such determinations limit STRMU assistance to the difference between the amounts due and the amount the household is able to pay. STRMU providers should document any payments or contributions made by a household towards their rent, mortgage,

and/or utility costs. This ensures that the full amount due is paid and avoids partial payments that may lead to evictions or utility cut-offs.

For example, through the assessment process, a STRMU provider might determine that the client is able to pay \$200 of their \$800 rent (equal to $\frac{1}{4}$ of the total). For the purposes of tracking, the amount of weeks or period of assistance used would be only for the part of the monthly housing costs assisted by STRMU. In this example, $\frac{3}{4}$ of the month or three weeks of assistance would count towards the household's total eligible STRMU period (see Section 3.3). In this example, the household's rent payment of \$200 decreases the amount of time that counts towards the eligible STRMU period. If the household had a need to apply again for STRMU assistance within the same 52 week period, that household would have more time remaining in its eligible STRMU period than if the household had not made any contribution towards the rent previously.

4.5 Capped Payments

HOPWA grantees may establish or may authorize a project sponsor to establish a dollar limit or "capped payment" amount of STRMU financial assistance for individual households. In establishing a capped amount, grantees must assess the area's Fair Market Rent, rent reasonableness, and/or other measure of the area's housing market. The goal of this assessment is to ensure that the level of support allowed is sufficient to avoid an ongoing household housing crisis. A community may use the local Public Housing Authority Housing Choice Voucher Program (HCVP) payment standards as the capped payment amount, may place a limit on the total dollar amount of funding a client is eligible to receive, or the number of times in the 52-week period a client may apply for assistance.

If caps on the allowable amount of STRMU assistance are established, the use of these caps must be applied in a uniform, consistent and non-discriminatory manner by a grantee and all of its funded project sponsors. In the case that a household receives the maximum capped STRMU assistance amount, HUD will consider the assistance to have been attributable to the entire 21-week period allowed by the regulations.

If the grantee establishes, or allows a project sponsor to establish, a capped amount of STRMU assistance, the use of the limit must be included as an expressed element of a formula grantee's Annual Action Plan and Consolidated Plan or as a specific element in a competitive grantee's approved application. The use of capped payments should be assessed for its appropriateness in providing assistance to eligible persons and monitored for consistency by the grantee and cover the four items discussed in Section 2.3. Grantees may ask questions or

request technical assistance through the HUD Exchange website, if they need additional support to develop a method to conduct such an assessment.

HUD Exchange – Ask A Question Help Desk

<https://www.hudexchange.info/get-assistance/my-question/>

HUD Exchange – Request Technical Assistance

<https://www.hudexchange.info/technical-assistance/>

5. Performance Objectives

5.1 Annual Reporting

STRMU assistance is designed to help stabilize clients who are already housed and to provide support to develop a permanent housing and supportive services plan for long-term stabilization. Continued reliance on STRMU's time limited assistance does not represent a stable living situation despite a temporary reduction in risk of homelessness.

HOPWA formula and competitive grantees are required to submit an annual performance report, which includes performance information for all activities undertaken during each program year. In addition, grantees must submit this performance information via the Integrated Disbursement Information System (IDIS) and demonstrate coordination with other Consolidated Plan resources.

The annual performance report provides data on client outputs and outcomes that enables an assessment of grantee performance in achieving the housing stability outcome measure. The annual performance report, in conjunction with IDIS, fulfills statutory and regulatory program reporting requirements and provides the grantee and HUD with the necessary information to assess the overall program performance and accomplishments against planned goals and objectives. HUD uses the annual performance report and IDIS to obtain and manage essential information on grant activities, project sponsors, housing sites, housing units, eligible persons, and beneficiaries (which includes racial and ethnic data on all household members). Additional information on performance reporting for HOPWA grantees is available through the links below.

HOPWA Performance Management

<https://www.hudexchange.info/hopwa/hopwa-performance-management-and-monitoring>

IDIS Guides, Tools and Webinars for the HOPWA Program

<https://www.hudexchange.info/idis/guides/hopwa>

5.2 Performance Goals

At the beginning of each operating year, grantees must estimate two output goals: (i) the number of households expected to be served with STRMU assistance and (ii) the dollar amount of STRMU assistance by type of assistance provided, including personnel costs to deliver STRMU assistance. These output goals should be consistent with goals established in the Consolidated Plan and Annual Action Plan for formula grantees and with targets established in the approved applications and/or grant agreements with HUD for competitive grantees.

The Consolidated Plan regulations, at 24 CFR 91.220(l)(3), provide that HOPWA EMSA grantees must establish one-year goals for the number of households to be provided housing subsidy assistance through the use of STRMU activities. A similar provision applies to HOPWA state grantees under 24 CFR 91.320(k)(4). Grantees are responsible for carrying out planned activities consistent with the HUD-approved grant agreement for their award. Pursuant to section 24 CFR 91.520, grantees are required to provide a report on the comparison of actual to planned outcomes. Annual output goals are established in grant agreements to demonstrate the expected use of STRMU funds. At the end of each operating year, the grantee will report to HUD on the total number of individual households that benefited from STRMU assistance by remaining stably or temporarily housed in their own dwelling. Note that this measure is not the number of individual payments of rent, mortgage, or utility assistance, as more than one payment of assistance may be made on behalf of an assisted household during that operating year, based on assessed need and consistent with the eligible STRMU period.

5.3 Output and Outcome Performance Measures

HUD has established required program output and outcome measures to determine how STRMU assistance helps households maintain stable housing, reduce the risks of homelessness, and improve access to healthcare, employment, and other support. These output and outcome measures enable grantees and HUD to assess the effectiveness of activities in addressing the housing needs of assisted households and to increase housing stability for those households over time. STRMU providers should not rely solely on this short-term assistance to assist households in achieving housing stability. STRMU assistance is intended to resolve housing crises and to help assisted households become self-sufficient. Efforts must involve on-going assessment of employability, life skills, and housing needs. This effort can be evidenced by the development and use of an individual housing and services plan for assisted households, with a focus on how the household will access job training, benefits counseling, vocational rehabilitation, employment and/or on-going permanent housing assistance.

The outcome measures identify households that have been assisted with STRMU. The outcome goal of STRMU is to reduce the risks of homelessness and improve access to employment,

health care, and other support through public and private resources. At the end of each operating year, HOPWA grantees are asked to consider the effects of their efforts and report household outcomes to HUD. These outcome assessments help the community, as well as HUD, in assessing past performance and directing future efforts to increase the percentage of assisted households in stable housing situations. Additionally, STRMU providers can utilize the information to consider alternatives or program enhancements if activities do not result in adequate and appropriate benefits for eligible households.

The output and outcome measures for STRMU assistance as established in the HOPWA annual reports and IDIS include the following four data elements:

Output #1:
Housing Outputs on Number of Households Assisted

Grantees must report the estimated (goal) number of households to be supported with STRMU assistance funds and the actual number of households served by STRMU assistance during the operating year. Note that the report counts each household that received assistance during the program year only once regardless of the number of months of assistance the household received.

Output #2:
STRMU Outputs Summary

Grantees must provide a summary of STRMU assistance provided during the operating year by the type of assistance. The goal of this summary is to help the grantee, STRMU providers and HUD to understand the range of services required to prevent homelessness. The summary includes the actual number of households served and expenditures for any combination of rent, mortgage, and/or utility assistance along with program delivery costs (personnel costs). Grantees and STRMU providers should use this information to help examine program trends and ensure that a full continuum of services such as foreclosure mitigation services, employment training, and budget counseling are in place to promote long-term housing stability.

Output #3:
Client Outcomes on Housing Stability and Reduced Risks of Homelessness

Grantees must provide current year outcomes on the housing status of STRMU assisted households. Housing status outcomes are defined by the following three categories: Stable Housing; Temporarily Stable, with Reduced Risks of Homelessness; and Unstable Arrangements. Annual outcome data can be compared with a baseline of the number of STRMU-assisted households from previous operating years.

Housing Status Outcome: Stable Housing

Stable Housing is the sum of the number of households that accessed assistance for some portion of the 21-week eligible STRMU period and there is reasonable expectation that additional support is not needed in order to maintain permanent housing living situation (as this is a time-limited form of housing support).

Stable Housing outcomes are reported as one of the following housing status categories:

- Maintain Private Housing without subsidy;
- Other Private Housing without subsidy;
- Other HOPWA Housing Subsidy Assistance;
- Other Housing Subsidy (PH); or
- Institution.

Housing Status Outcome: Temporarily Stable, with Reduced Risk of Homelessness

Temporarily Stable, with Reduced Risk of Homelessness is the sum of the number of households that accessed assistance for some portion of the 21-week eligible STRMU period and there is a reasonable expectation that additional support will be needed to maintain housing arrangements in the following year. These households may need additional STRMU assistance at some future time or may have left their current housing arrangement for a transitional facility or other temporary/non-permanent housing arrangement.

Temporarily Stable outcomes are reported as one the following housing status categories:

- Likely that additional STRMU is needed to maintain current housing arrangements;
- Outplacement to Transitional Facilities/Short-Term; or
- Outplacement to Temporary/Non-Permanent Housing arrangement.

Housing Status Outcome: Unstable Arrangements

Unstable Arrangements is the sum of number of households reported under the following housing status categories: Emergency Shelter/Street; Jail/Prison; or Disconnected.

Housing Status Outcome: Life Event

If a household that accessed assistance during the operating report experienced the death of the HOPWA eligible person, then that outcome is reported as a Life Event.

Output #4:

Outcomes on Access to Health Care, Case Management Services and Employment Assistance and Training

To measure the effectiveness of this support, grantees must report access to care and support outcomes. These outcomes include: (i) has a housing plan for maintaining or establishing stable on-going residency; (ii) had contact with a case manager/benefit counselor consistent with the schedule specified in their individualized service plan; (iii) had contact with a primary health care provider consistent with the schedule specified in their individualized service plan; (iv) accessed or maintained access to medical insurance coverage or medical assistance; (v) successfully accessed or maintained qualification for a source of income; and (vi) obtained an income-producing job that resulted from HOPWA-funded job training, employment assistance, education or case management/counseling services.

Grantees should consider how STRMU-assisted households can improve their access to other support needed to establish a more stable housing situation. Assessing access to care and support outcomes can be a useful step in identifying how to improve access to critical services for STRMU assisted households. Case management services can enable STRMU households to maintain stable living arrangements by accessing other supportive services such as employment training and benefits counseling along with healthcare and mainstream services. Such efforts may be shown in changes in the household incomes, through access to other public benefits or employment.

6. Other HOPWA Eligible Activities

STRMU support is limited to helping households on a temporary basis to maintain a current residence. Other forms of HOPWA support such as Supportive Services, Permanent Housing Placement assistance, and the costs for on-going housing support through rental assistance programs, should be used to complement the use of short-term assistance and promote housing stability.

6.1 Supportive Services

Grantees must assure that adequate supportive services are made available to all HOPWA households as stated in 24 CFR 574.500(b)(3). These supportive services do not have to be HOPWA-funded. Grantees have the discretion to fund these services directly or to ensure that HOPWA households are connected to non-HOPWA funded supportive services that are available in the community.

If a grantee elects to fund HOPWA Supportive Services, households receiving STRMU assistance are eligible to receive such services, as provided by 24 CFR 574.310(a)(1). Activities and costs

related to delivering HOPWA Supportive Services are distinct from those related to delivering STRMU assistance and must be separately tracked and allocated as a HOPWA Supportive Services activity, not STRMU. HOPWA Supportive Services include, but are not limited to, costs related to developing an individual housing and services plan, assisting households in locating and obtaining housing, tenant/housing counseling, employment-related services and training, and assisting households to access other mainstream benefits. HOPWA Supportive Services should be specifically designed to maintain the households in housing and may continue to be provided to eligible households that remain housed after the 21-week eligible STRMU period.

HUD, in partnership with the U.S. Department of Labor (DOL) developed *Getting to Work: A Training Curriculum for HIV/AIDS Service Providers and Housing Providers*. The online training curriculum provides an overview of the reasons why employment services for people living with HIV/AIDS are essential, describes successful approaches to incorporating employment into HIV/AIDS service provision, and highlights promising programs. More information on *Getting to Work* is available via the link below.

Getting to Work: A Training Curriculum for HIV/AIDS Service Providers and Housing Providers
<https://www.hudexchange.info/training-events/dol-hud-getting-to-work-curriculum-for-hiv-aids-providers/>

6.2 Permanent Housing Placement

Permanent Housing Placement (PHP) assistance at 24 CFR 574.300(b)(7) may be used to help HOPWA-eligible persons establish a new residence where on-going occupancy is expected to continue. If long-term housing stability for a STRMU-assisted household is not expected in their current housing arrangements, PHP may be used to assist that household to find and move into a more affordable, permanent housing option. Note that this assistance should be part of the STRMU-assisted household's individual housing plan.

Eligible costs under PHP include services and financial assistance costs. Eligible PHP service costs include services or activities designed to assist individuals or families in locating suitable housing, which at a minimum would be referral to housing that is decent, safe and sanitary, subject to requirements covering other assistance programs (if applicable). PHP service costs may also include the following: providing tenant counseling; assisting households to understand leases, secure utilities, and make moving arrangements; and providing mediation services related to tenant and/or landlord issues that may arise during the leasing-up process. Eligible PHP financial assistance costs include the following housing placement costs: application fees, related credit checks, utility hookup fees, and reasonable security deposits necessary to move

persons into permanent housing. Security deposits must not exceed two months of rent and such funds shall be designated to be returned to the program.

The following costs are not eligible under HOPWA PHP: costs for housing supplies, smoke alarms, standard furnishings, minor repairs to the unit associated with the move-in, and other incidental costs for occupancy of the housing unit. While these items are not eligible as HOPWA PHP costs, grantees may make use of leveraged funds or donations to address the related needs for other move-in support for HOPWA assisted households. Additional guidance on PHP is available at the link below.

Permanent Housing Placement Service Fact Sheet

<https://www.hudexchange.info/resource/1014/permanent-housing-placement-services-fact-sheet/>

6.3 Connection to Permanent Housing

As a short-term intervention tool, STRMU assistance is not intended to provide continuous or perpetual assistance. Other types of long-term permanent housing assistance should be employed when household assessments indicate that little or no improvement of the conditions that caused the current financial burden are likely during or after the 21-week eligible STRMU period. Other long-term permanent housing assistance and/or programs include:

- HOPWA Project-Based or Tenant-Based rental assistance and facility-based housing
<https://www.hudexchange.info/hopwa;>
- Housing Choice Vouchers (formerly Section 8)
http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/hcv;
- HUD-Veterans Affairs Supportive Housing (HUD-VASH)
http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/hcv/vash;
- Continuum of Care (CoC) Program
[https://www.hudexchange.info/programs/coc/;](https://www.hudexchange.info/programs/coc/)
- Public Housing
http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/ph;
- HOME Investment Partnerships Program
[https://www.hudexchange.info/programs/home/;](https://www.hudexchange.info/programs/home/)
- Section 811 Supportive Housing for Persons with Disabilities Program

http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh/grants/section811pt1;

- Section 202 Supportive Housing for the Elderly Program
http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh/progdesc/eld202;
- Low-income Housing Tax Credits
http://lihtc.huduser.gov/agency_list.htm;
- United States Department of Agriculture Housing Assistance
http://www.usda.gov/wps/portal/usda/usdahome?navid=HOUSING_ASSISTA;
- And other state and local resources, when available.

If it is determined that a STRMU-assisted household needs ongoing rental assistance or other forms of long-term permanent housing beyond the eligible STRMU period to address immediate housing needs, STRMU providers should seek to connect households to these resources. Households that were assisted with STRMU are eligible to receive other types of HOPWA housing subsidy assistance, and complementary HOPWA Supportive Services, if that assistance would meet the household's assessed need. Note that many available housing programs provide rental housing assistance and, therefore, are not available to homeowners seeking mortgage assistance.

Rental assistance subsidy programs address monthly housing costs, but may not provide assistance for security deposits, including last month's rent, and/or utility deposits. HOPWA Permanent Housing Placement funding may be used for this purpose (see Section 5.2).

7. Waivers

7.1 Waiver Requests

Waivers of the time-limited 21-week eligible STRMU period may be granted by HUD for a period of one year for an individual household. Waivers are subject to approval by the Assistant Secretary for Community Planning and Development (CPD) and the concurrence of the Office of General Counsel (OGC). Although other forms of HOPWA or other program assistance may be available to grantees or project sponsors to address the on-going housing needs, in certain situations it may be necessary to obtain a waiver of the eligible STRMU period. Grantees should be in contact with their local HUD Field Office representative to consider and discuss the waiver process. Ultimately, HUD's Assistant Secretary for Community Planning and Development considers all waivers for approval, with the concurrence of the Office of General Counsel (OGC). The Office of HIV/AIDS Housing will provide support for the Assistant

Secretary's consideration of the STRMU waiver request and will help process all requests with concurrence by OGC.

Waiver requirements are found in the regulations at 24 CFR 574.330(a)(2). HUD may waive, as it determines appropriate, the STRMU time limitations based on the good faith effort of the grantee or project sponsor to provide permanent housing or housing in a living environment appropriate to the client's health or social needs. However, since grantees can make use of rental assistance under 24 CFR 574.300(b)(5) in lieu of continuing short-term assistance, a waiver of the term limit should only be requested in special circumstances and not for reasons of administrative convenience. HUD will require that the suitability for continued use of STRMU assistance be shown in an individual housing and services plan for the household to evidence good faith effort.

Waiver requests must address the assisted household's housing quality standards. For clients receiving rental assistance in excess of 24 CFR 574.320(a), waiver requests must also address the maximum subsidy limit. Housing that does not meet the housing quality standards found at 24 CFR 574.310(b) is not, in CPD's determination, appropriate to any household's health or social needs. Similarly, CPD has determined that households living in rental housing and receiving STRMU assistance in excess of the maximum, monthly subsidy under 24 CFR 574.320(a) are not appropriately housed. Waiver requests should demonstrate that the household's on-going housing needs were assessed in connection with efforts to access other support, such as the development of an individual housing and services plan for the household and the provision of support to access other forms of needed services and/or assistance.

Waivers of the time limit for STRMU assistance may extend a household's benefits for a defined period of time specified in the request, such as the remainder of the year, if it is determined and documented that no other appropriate housing options are available that would maintain an adequate and stable living arrangement during this period. Waivers will not be approved for indefinite or unrealistic periods.

The grantee and/or STRMU provider must evaluate each household's level of need to determine if it is appropriate to maintain the household in an independent living environment prior to requesting a waiver to extend the period of assistance beyond the eligible STRMU period of 21 weeks. An approved waiver would serve to extend a household's STRMU assistance for an increased period of time, but households may not be able to regain independence in their current housing arrangement. A good faith effort to provide long-term housing solutions must be pursued for each household. Under certain circumstances, the household's current living arrangement may be the most appropriate for his or her health and

social needs and, therefore, may be deemed more appropriate than relocating that household. In such situations, the housing should be deemed to be safe, decent, and sanitary as determined by a housing quality inspection. Households in substandard living arrangements shall not be granted waivers to extend STRMU assistance and must be referred to organizations that can provide the appropriate and necessary level of housing and support.

7.2 Waiver Procedures

HUD Field Offices must follow the standard procedures used when the waiver of a regulation provision is requested. HUD's CPD Directors are not authorized to approve waivers but may recommend such actions. To expedite waivers so that they may be obtained in a timely manner (such as before payments for a 22nd week or sixth month of assistance are needed), the CPD Director should send a concurring or non-concurring statement, together with the grantee's written waiver request to the Assistant Secretary for Community Planning and Development. Given the time-limited nature of STRMU assistance, please also alert the Office of HIV/AIDS Housing at HUD Headquarters as soon as practical. Notification that this type of waiver request is underway enables HUD to provide support for preparing a time-sensitive response. Grantees should seek to submit any needed waiver request for the household at least four weeks prior to the end of the 21-week eligible STRMU period, as these requests require review actions by a number of HUD offices.

In granting waiver requests, HUD will consider the appropriateness of the housing to the needs of the individual household, such that the current level of housing support will maintain the household in an independent living situation in a reasonable manner. HUD will also consider the grantee's good faith effort to access and/or provide permanent housing. Good faith efforts include housing case management efforts or Housing Information Services to secure alternate housing solutions, housing counseling efforts, as well as placing the client on wait lists for permanent housing assistance, such as HOPWA Project-based or Tenant-Based Rental Assistance, Housing Choice Vouchers or other affordable permanent housing resources. Each household for whom a waiver is sought must attest that the conditions that caused the original financial burden and need continue to exist, and without this assistance the household would be at risk of homelessness. Prior to soliciting HUD's approval of a waiver, the STRMU provider shall document the household's capacity to live independently and that the level of benefits received is sufficient to satisfactorily sustain the household in their current dwelling.

7.3 Oversight of Waivers

After HUD approves a waiver of the time limitation, the grantee and HUD staff should provide adequate grants management oversight, including on-site monitoring, to inspect a sampling of files representing those households for whom waivers were issued. An effort should be made to determine if these households have been moved to permanent housing or continue to

receive STRMU assistance and that the type of housing assistance is appropriate to their needs. Grantees must ensure that adequate documentation for each assisted household is maintained and available for HUD review. The *HOPWA Grantee Oversight Resource Guide*, available at the link below, is a comprehensive guide to monitoring and oversight.

HOPWA Grantee Oversight Resource Guide

<https://www.hudexchange.info/resource/1003/hopwa-grantee-oversight-resource-guide/>