**Continuum of Care**

**COVID-19 WAIVERS**

**Case File Recordkeeping Checklist**

In accordance with 24 CFR 578.103(a), we have established standard operating procedures that ensure that Continuum of Care program funds are used in accordance with the requirements of 24 CFR 578 and that sufficient records will be maintained to enable HUD to determine whether we, as a Recipient or Subrecipient, are meeting the requirements of this part.

As part of those policies and procedures, this CASE FILE CHECKLIST tracks the waivers used for this client household.

**On (insert date), we informed the HUD CPD Director of our intent to implement the waivers described below for the following CoC Projects (list applicable project names and Grant Numbers). A copy of that email request is attached.**

**Waivers USED IN THE CASE:** (case id)**\_\_\_ (select those that apply):**

**To maintain administrative records for the waived provisions, we will obtain the documentation described below, to the best of our ability given the public health emergency.**

**In instances where we are unable to obtain the records outlined below, we will document all efforts taken to obtain them, which will serve as our administrative record.**

**(Select Those That Apply):**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Check if**  **WAIVER was APPLIED TO THIS CASE** | **Requirement** | **Suggested Recipient Documentation\*** | **Suggested Client Level Documentation\*** | **Notes** |
|  | **Fair Market Rent for Individual Units and Leasing Costs**  24 CFR 578.49(b)(2) | 1) Documentation that FMR limits are impeding grantee’s ability to find units for clients as a result of COVID-19; 2) Copy of waiver notification sent to HUD; 3) Emergency recordkeeping policies and procedures | 1) A copy of the lease clearly displaying the date of execution; 2) a note to file noting the date of the COVID-19 Memorandum and its application to the client’s lease; 3) a completed rent reasonableness analysis. | Rent Reasonableness  Comparison  Lease in file dated between March 31 and September 30, 2020.  Caution: Waiver applies to the full period of the lease, beyond Sept. 30, 2020 but does not apply to annual renewal of lease in 2021. |
|  | **Disability Documentation for Permanent Supportive Housing (PSH)**  24 CFR 578.103(a) and 24 CFR 578.103(a)(4)(i)(B) | 1) Documentation of COVID-19 related constraints preventing collection of disability documentation such as shelter-in-place orders or office closures; 2) Copy of waiver notification sent to HUD; 3) Emergency recordkeeping policies and procedures | 1) Copies of certifications; 2) a note in the files of affected clients outlining application of the waiver and compliance with the timeframe | Case Worker or Intake staff observation note & Certification form  (Outreach worker information to support when applicable)  Self- Certification  Dated: March 31 – September 30, 2020  (Note: Certification continues past Waiver period.) |
|  | **Limit on Eligible Housing Search and Counseling Services**  24 CFR 578.53(e)(8)(ii)(B) and 578.53(d) | 1) Emergency recordkeeping policies and procedures outlining how grantee will define “difficulty obtain[ing] housing”; 2) Copy of waiver notification sent to HUD | Documentation demonstrating the client’s inability to obtain housing as a direct result of rent and utility arrears. | Applies only to housing search / placement. (Pay arrears in order to access housing)  Document utility or rental arrears (bill/ notice)  Dated March 31, 2020 – March 30, 2021 |
|  | **Permanent Housing-Rapid Re-housing Monthly Case Management**  24 CFR 578.37(a)(1)(ii)(F) | 1) Documentation of limited staff capacity, shelter-in-place order, or similar COVID-19 related impediment; 2) Copy of waiver notification sent to HUD; 3) Emergency recordkeeping policies and procedures | A note in the files of affected clients outlining application of the waiver. | Case note: Unable to provide case management.  Applies only for the period March 31, - May 31, 2020. |
|  | **Housing Quality Standards (HQS) – Initial Physical Inspection of Unit**  24 CFR 578.75(b)(1) | 1) Emergency recordkeeping policies and procedures that outline the reinspection process; 2) Copy of waiver notification sent to HUD | 1) A completed HQS inspection form noting the method of observation, date, and a reference to the waiver. 2) By the 3-month deadline, a completed on-site inspection. | (Overall agency policy referenced. Copy not required in file.)  Link to video, photos or worker written verification of inspection with date.  (Inspection video / photo can be provided by landlord).  OR  Note of prior inspection and overall agency policy to re-inspect. |
|  | **HQS – Re-Inspection of Units** 24 CFR 578.75(b)(2) | 1) Copy of waiver notification sent to HUD; 2) Emergency recordkeeping policies and procedures | A note in the files of affected clients. | Housing placement within March 31, 2020 – March 30, 2021 |
|  | **One-Year Lease Requirement**  **24 CFR 578.3, definition of permanent housing,** 24 CFR 578.51(l)(1) | 1) Documentation outlining constraints related to 1-year lease requirement; 2) Copy of waiver notification sent to HUD; 3) Emergency recordkeeping policies and procedures | A notation in the files of affected clients along with a copy of the lease indicating the term. | Case note and copy of lease  Signed between March 31 – Sept 30, 2020 |

*\*Documentation may be electronic.*

**Name & Title of Authorizing Official:**

**Signature: Date:**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**