

COVID-19 Waiver Suggested Documentation

The following chart outlines suggested documentation grantees should maintain when implementing the waivers outlined in the CPD COVID-19 Memorandum issued April 1, 2020.

Grantees are strongly encouraged to establish a set of emergency policies and procedures that outline the flexibilities in the Memorandum that it wishes to utilize.

Continuum of Care (CoC)

Requirement	Suggested Documentation*
Fair Market Rent for Individual Units and Leasing Costs 24 CFR 578.49(b)(2)	1) A copy of the lease clearly displaying the date of execution; 2) a note to file noting the date of this memo and its application to the client's lease; 3) a completed rent reasonableness analysis.
Disability Documentation for Permanent Supportive Housing (PSH) 24 CFR 578.103(a) and 24 CFR 578.103(a)(4)(i)(B)	1) Copies of certifications; 2) a note in the files of affected clients outlining application of the waiver and compliance with the timeframe.
Limit on Eligible Housing Search and Counseling Services 24 CFR 578.53(e)(8)(ii)(B) and 578.53(d)	Documentation demonstrating the client's inability to obtain housing as a direct result of rent and utility arrears.
Permanent Housing-Rapid Re-housing Monthly Case Management 24 CFR 578.37(a)(1)(ii)(F)	A note in the files of affected clients outlining application of the waiver.
Housing Quality Standards (HQS) – Initial Physical Inspection of Unit 24 CFR 578.75(b)(1)	A completed HQS inspection form noting the method of observation, the reason for not conducting the inspection-in person and a reference to the waiver.
HQS – Re-Inspection of Units 24 CFR 578.75(b)(2)	A notation in the files of affected clients.
One-Year Lease Requirement 24 CFR 578.3, definition of permanent housing, 24 CFR 578.51(l)(1)	A notation in the files of affected clients along with a copy of the lease indicating the term.

**Documentation may be electronic.*

Consolidated Plan Requirements

Requirement	Suggested Documentation*
Citizen Participation Public Comment Period for Consolidated Plan Amendment 24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401	Documentation demonstrating publication and 5-day comment period. A record of all comments received, and responses must be submitted with the amendment.
Citizen Participation Reasonable Notice and Opportunity to Comment 24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401	Policies and procedures referencing the waiver and including the definition of "reasonable notice and opportunity to comment".

**Documentation may be electronic.*

Emergency Solutions Grants (ESG)

Requirement	Suggested Documentation*
HMIS Lead Activities 24 CFR 576.107(a)(2)	Documentation demonstrating the costs met the “necessity” threshold established in the policies and procedures.
Re-evaluations for Homelessness Prevention Assistance 24 CFR 576.401(b)	1) A note in the files of affected clients; 2) and documentation demonstrating compliance with the 6-month requirement.
Housing Stability Case Management 24 CFR 576.401(e)	A note in the files of affected clients.
Restriction of Rental Assistance to Units with Rent at or Below FMR 24 CFR 576.106(d)(1)	1) A copy of the lease clearly displaying the date of execution; 2) a note to file noting the date of this memo and its application to the client’s lease; and 3) a completed rent reasonableness analysis.

**Documentation may be electronic.*

Housing Opportunities for Persons With AIDS

Requirement	Suggested Documentation*
Self-Certification of Income and Credible Information on HIV Status 24 CFR 574.530	1) A note in the files of affected clients demonstrating applicability of the waiver; 2) copies of the self-certifications.
FMR Rent Standard 24 CFR 574.320(a)(2)	Policies and procedures establishing a new rent standard to be applied during the applicable one-year period.
Property Standards for TBRA 24 CFR 574.310(b)	1) A completed HQS inspection form noting the method of observation, the reason for not conducting the inspection-in person and a reference to the waiver; AND 2) Policies and procedures outlining the re-inspection process.
Space and Security 24 CFR 574.310(b)(2)(iii)	1) Documentation demonstrating quarantine recommendation of local health-care professionals including the timeframe for quarantine; 2) a note in the file of affected clients outlining the application of the waiver.

**Documentation may be electronic.*