

Emergency Solutions Grant Recordkeeping COVID-19 Emergency Recordkeeping Protocol

In accordance with 24 CFR 576, we have established standard operating procedures to ensure Continuum of Care program funds are used in accordance with the requirements of 24 CFR 576 and sufficient records are maintained to enable HUD to determine whether we, as a Recipient or Subrecipient, meet the requirements of these regulations.

As part of those policies and procedures, this Emergency Protocol outlines the HUD Mega Waivers we have elected and describes the recordkeeping process associated with each waiver.

On _____, 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.

Projects Affected:

1. _____
2. _____
3. _____

Waivers Requested (check those that apply below):

✓	Requirement	Applicability	Other Provisions
<input type="checkbox"/>	HMIS Lead Activities 24 CFR 576.107(a)(2)	For the 6-month period beginning on the date of the waiver memorandum (3/31/2020), the condition that the recipient must be the HMIS Lead to pay costs under 24 CFR 576.102(a)(2) is waived to the extent necessary to allow any recipient to use ESG funds to pay costs of upgrading or enhancing its local HMIS to incorporate data on ESG Program participants and ESG activities related to COVID-19	n/a
<input type="checkbox"/>	Re-Evaluations for Homelessness Prevention Assistance 24 CFR 576.401(b)	For up to the 2-year period beginning on the date of the waiver memorandum (3/31/2020), the required frequency of re-evaluations for homelessness prevention assistance under section 576.401(b) is waived	The recipient or subrecipient must conduct the required re-evaluations not less than once every 6 months
<input type="checkbox"/>	Housing Stability Case Management 24 CFR 576.401(e)	For the 2-month period beginning on the date of the waiver memorandum (3/31/2020), this waiver is in effect	n/a

<input type="checkbox"/>	Restriction of Rental Assistance to Units with Rent at or Below FMR 24 CFR 576.106(d)(1)	For the 6-month period beginning on the date of the waiver memorandum (3/31/2020), the FMR restriction is waived for any individual or family receiving Rapid Re-housing or Homelessness Prevention assistance who executes a lease for a unit	The ESG recipient or subrecipient must still ensure that the units in which ESG assistance is provided to these individuals and families meet the rent reasonableness standard
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To maintain program and client 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 program and client record.

Check those that apply below:

✓	Requirement	Suggested Recipient Documentation*	Suggested Client Level Documentation*
<input type="checkbox"/>	HMIS Lead Activities 24 CFR 576.107(a)(2)	1) Documentation of the need to upgrade or enhance the HMIS as a result of COVID-19 and that it met the “necessity” threshold established in the policies and procedures; 2) Copy of waiver notification sent to HUD	n/a
<input type="checkbox"/>	Re-Evaluations for Homelessness Prevention Assistance 24 CFR 576.401(b)	1) Documentation demonstrating need to keep participant housed during COVID19 pandemic; 2) Copy of waiver notification sent to HUD; 3) Emergency recordkeeping policies and procedures	1) A note in the files of affected clients; 2) Documentation demonstrating compliance with the 6-month requirement.
<input type="checkbox"/>	Housing Stability Case Management 24 CFR 576.401(e)	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	1) A note in the files of affected clients.
<input type="checkbox"/>	Restriction of Rental Assistance to Units with Rent at or Below FMR 24 CFR 576.106(d)(1)	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 this memo and its application to the client’s lease; and 3) A completed rent reasonableness analysis.

*Documentation may be electronic.



Name & Title of Authorizing Official:

Signature:

Date: