

Housing Opportunities for Persons with AIDS COVID-19 Emergency Recordkeeping Protocol

In accordance with 24 CFR 574, we have established standard operating procedures to ensure Continuum of Care program funds are used in accordance with the requirements of 24 CFR 574 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
	Source Documentation for Income and HIV Status Determinations 24 CFR 574.530	This waiver will permit HOPWA grantees and project sponsors to rely upon a family member’s self-certification of income and credible information on their HIV status (such as knowledge of their HIV-related medical care) in lieu of source documentation to determine eligibility for HOPWA assistance of families and grantees affected by COVID-19. Eligibility is restricted to a low-income person who is living with HIV/AIDS and the family of such person.	This waiver is in effect for recipients who require written certification of the household seeking assistance of their HIV status and income, and agree to obtain source documentation of HIV status and income eligibility within 3 months of public health officials determining no additional special measures are necessary to prevent the spread of COVID-19.
	Rent Standard for Tenant-Based Rental Assistance (TBRA) 24 CFR 574.320(a)(2)	This waiver of the FMR rent standard limit permits HOPWA grantees to establish rent standards. Grantees are required to ensure the reasonableness of rent charged for a unit in accordance with §574.320(a)(3).	This waiver is required to expedite efforts to identify suitable housing units for rent to HOPWA beneficiaries and HOPWA-eligible families that have been affected by COVID-19, and to provide assistance to families that must rent units at rates that exceed the HOPWA grantee's normal rent

			standard as calculated in accordance with §574.320(a)(2). Such rent standards may be used for up to one year beginning on the date of this memorandum.
	Property Standards for Tenant-Based Rental Assistance (TBRA) 24 CFR 574.310(b)	This waiver is required to enable grantees and project sponsors to expeditiously meet the critical housing needs of the many eligible families that have been affected by COVID-19 while also minimizing the spread of the coronavirus.	This waiver is in effect for one year beginning on the date of this memorandum for recipients and project sponsors that are able to meet the following criteria: The recipient or project sponsor is able to visually inspect the unit using technology, such as video streaming, to ensure the unit meets HQS before any assistance is provided.
	Adequate Space and Security 24 CFR 574.310(b)(2)(iii)	This waiver is required to enable grantees and project sponsors operating housing facilities and shared housing arrangements the flexibility to use optional appropriate spaces for quarantine services of eligible households affected by COVID-19. Optional spaces may include the placement of families in a hotel/motel room where family members may be required to utilize the same space not allowing for adequate space and security for themselves and their belongings.	This space and security requirement is waived for grantees addressing appropriate quarantine space for affected eligible households during the allotted quarantined time frame recommended by local health care professionals

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*
	Source Documentation for Income and HIV Status Determinations 24 CFR 574.530	Create protocol for what is determined is appropriate self-certification documentation	A note in the affected client's file when the client enters the program and within three months after the public health crisis ends
	Rent Standard for Tenant-Based Rental Assistance (TBRA) 24 CFR 574.320(a)(2)	Rent reasonableness standards should be determined based on unit size, rents being charged for comparable unassisted units in the area, also considering the location, size, type, quality, amenities,	A rent reasonableness form should be developed and added to each affect client's file.

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		facilities, management and maintenance of each unit.	
	Property Standards for Tenant-Based Rental Assistance (TBRA) 24 CFR 574.310(b)	Develop policies to virtually inspect units; Develop written policies to physically re-inspect the unit after the health officials determine special measures to prevent the spread of COVID-19 are no longer necessary.	A note in the affect client's file for the virtual inspection A follow up noted for the next physical inspection
	Adequate Space and Security 24 CFR 574.310(b)(2)(iii)	Document the standards that would require the use of additional spaces.	Document the standards that each affected client displayed.

**Documentation may be electronic.*

Name & Title of Authorizing Official:

Signature:

Date: