

HUD MEGA WAIVER GUIDANCE

Waiver Overview

Presented by the Planning Team of CARES of NY, Inc.

CONTINUUM OF CARE WAIVERS

- Fair Market Rent for Individual Units and Leasing Costs
- Disability Documentation for Permanent Supportive Housing
- Limit on Eligible Housing Search and Counseling Services
- Permanent Housing and Rapid Re-housing Monthly Case Management
- Housing Quality Standards
 - 1) Initial Physical Inspection
 - 2) Re-Inspection of Units, and
- Flexibility on One-Year Lease Requirement

ESG/STEHP WAIVERS

- HMIS Lead Activities
- Re-evaluations for Homelessness Prevention Assistance
- Housing Stability Case Management, and
- Restriction of Rental Assistance to Units with Rent at or Below FMR

HOPWA WAIVERS

- Self-Certification of Income and Credible Information on HIV Status
- Fair Market Rent Standard
- Property Standards for Tenant Based Rental Assistance, and
- Priority on Space and Security

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Waivers Have Been Submitted, Now What?

Presented by Kirstin Jones of CARES of NY, Inc.

GOAL

- The goal of this webinar is to focus on the process of recordkeeping after HUD is notified of your agency's decision to use waivers to ensure records are being kept properly per HUD requirements

EXPEDITED FORMAL AMENDMENT PROCESS

- FY18 and FY19 executed grant agreements may be amended in the following ways:
 - Add eligible activities not included in the original contract agreement (e.g. Support Services)
 - Move funding between budget line items, including Rental Assistance
 - Extend the length of the current contract term to fully expend all awarded funding
 - FY18 grants may be extended to 12/31/2020. Please note changing the grant's operating start date will **permanently** impact future contract terms. (Starting on January 1st may subject the grant to delays by any government shutdowns due to Congressional budget impasses)
- Contact your CPD Representative for any change not listed

HOW TO EXPEDITE ALLOWED GRANT AMENDMENTS

- CARES COVID-19 Webpage will have a link to the HUD amendment guidance

EMERGENCY RECORDKEEPING PROTOCOL

- HUD is requiring that agencies utilizing waivers institute an Emergency Recordkeeping Protocol
- CARES will guide agencies through the process and have resources available on their website
 - Per HUD: The protocol should outline the waivers being utilized and describe the records that will be maintained to support their use.

PROCESS

- After electing to use waivers agencies must:
 - Fill out the applicable funding stream– COVID-19 Emergency Recordkeeping Protocol (these forms will be available on CARES’ website as a fillable PDF)
 - Review the Emergency Recordkeeping Protocols and adapt whichever policies apply to your agency and incorporate it as an addendum to your Policies and Procedures Manual (an example is on CARES’ website)
 - PDF copies of
 - Email notifying HUD of waiver use
 - Email reply from HUD accepting notification (if one was received)
 - Send everything (except addendum to Policies and Procedures) to your CARES representative

EMERGENCY RECORD KEEPING PROTOCOL

- Clarifying What Documentation is Needed to be Sent to CARES
 - UFA
 - Formally submit agency elected waivers (via form on CARES' website)
 - Collaborative Applicant
 - Submit agency elected waivers (via form on CARES' website) and HUD email exchange
 - ESG/HOPWA
 - Submit waiver elections (via form on CARES' website)
 - STEHP
 - Submit waiver elections (via form on CARES' website)

WHY

- HUD requires an Emergency Recordkeeping Protocol be implemented to ensure:
 - Agencies are in compliance and avoid findings during their next monitoring visit by CARES and/or HUD
 - Waivers are implemented fairly across all clients and programs

TO SUPPORT YOUR AGENCY

CARES created a draft protocol that can be tailored as your agency sees fit (it is available on CARES' website)

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