

**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
<input type="checkbox"/>	<b>Time Limits for Short-Term Supported Housing</b> 24 CFR 574.330(a)(1)	On an individual household basis, grantees or project sponsors may assist eligible households for a period that exceeds the time limits specified in the regulations. A short-term supported housing facility may provide residence to any individual for a period of up to 120 days in a six-month period. STRMU payments to prevent the homelessness of the tenant or mortgagor of a dwelling may be provided for costs accruing up to 52 weeks in a 52-week period.	This waiver is made available for all HOPWA grants except those funded under the CARES Act or for the portion of a grantee's FY 2020 formula funds that have been approved under its Annual Action Plan (AAP) for allowable activities to prevent, prepare for, and respond to the COVID-19 pandemic as described in section V. of Notice CPD-20-05.
<input type="checkbox"/>	<b>Property Standards for HOPWA</b> 24 CFR 574.310(b), Housing Quality Standards (HQS)	The grantee 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.	This waiver is in effect until September 30, 2021 for grantees and project sponsors that can meet the following criteria: 1. The grantee or project sponsor can visually inspect the unit using technology, such as video streaming, to ensure the unit meets HQS

			before any assistance is provided; and 2. The grantee or project sponsor has written policies to physically reinspect the units not previously physically inspected by December 31, 2021.
<input type="checkbox"/>	<b>Rent Standard for Tenant-Based Rental Assistance (TBRA)</b> 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). The FMR requirement continues to be waived until December 31, 2021.
<input type="checkbox"/>	<b>Source Documentation for Income and HIV Status Determinations</b> 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 grantees 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 by September 30, 2021.

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:

<input checked="" type="checkbox"/>	Requirement	Suggested Recipient Documentation*	Suggested Client Level Documentation*
<input type="checkbox"/>	<b>Time Limits for Short-Term Supported Housing</b> 24 CFR 574.330(a)(1)	The grantee or project sponsor has written policies and procedures outlining efforts to regularly reassess the needs of assisted households as well as processes for granting extensions based on documented financial needs and/or health and safety concerns.	A note in the client file that a good faith effort has been made on an individual household basis to assist the household to achieve permanent housing within the time limits specified in the regulations but that financial needs and/or health and safety concerns have prevented the household from doing so

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<input type="checkbox"/>	<b>Property Standards for Tenant-Based Rental Assistance (TBRA)</b> 24 CFR 574.310(b)	Develop policies to virtually inspect units; The grantee or project sponsor has written policies to physically reinspect the unit within 3 months 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
<input type="checkbox"/>	<b>Rent Standard for Tenant-Based Rental Assistance (TBRA)</b> 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, facilities, management, and maintenance of each unit.	A rent reasonableness form should be developed and added to each affect client's file.
<input type="checkbox"/>	<b>Source Documentation for Income and HIV Status Determinations</b> 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

*\*Documentation may be electronic.*

**Name & Title of Authorizing Official:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_