



MEMORANDUM

FROM: Steve DiLella, John Merz, Alice Minervino, and Sonya Jelks (CT BOS Co-Chairs)

TO: CT BOS CoC & DOH ESG funded Provider Agencies

DATE: July 19, 2021

RE: Round Six of COVID-19 Related Waivers to CoC and YHDP Requirements

Note: all blue underlined words throughout this document are live links. Clicking on the link will take you directly to the referenced document.

Dear Colleagues:

In light of the COVID-19 crisis, on [6/30/21 HUD released a memo](#) extending select waivers for the Continuum of Care (CoC) and Youth Homelessness Demonstration Project (YHDP) programs. This new memorandum extends waiver flexibilities established in HUD's [3/31/21 memorandum](#), [9/30/20 memorandum](#), [5/22/20 memorandum](#), [3/31/20 memorandum](#), and [12/31/20 memorandum](#). Some waivers have been extended to 9/30/21 others to 12/31/21. Additionally, HUD has established an expiration date of 9/30/21 for waivers previously authorized until public health officials determine no additional special measures are necessary to prevent the spread of COVID-19. This CT BOS memo has been updated to reflect the new information from HUD.

Waiver extensions and waivers that have now expired are indicated in **red text** in the attachment starting on page 3. The attachment also includes an overview of the available waivers for CoC/YHDP and ESG projects.

CT BOS previously provided a summary of all available waivers. That summary is available [here](#). Please note that some waivers have now been extended or have expired as noted in the attachment to this memo. **COC GRANTEES WISHING TO USE WAIVERS MUST ADOPT CERTAIN POLICIES & MAINTAIN CERTAIN DOCUMENTATION** (see [Sample Emergency Operation Policy](#)). Details about those requirements are also available [here](#).

Please use the available flexibility to prevent the spread of COVID-19 and to facilitate assistance to eligible households, particularly those most vulnerable to exposure to and/or serious complications from COVID-19.

If your agency is a Connecticut Balance of State Continuum of Care (CT BOS CoC) grant recipient (i.e., your agency receives CoC funds directly from HUD and not through another agency), you must take the actions specified below to enable waiver use. **Grantees that wish to use the waiver extensions must notify HUD of their intent to do so, even if they already submitted a**

notification of their intent to use the waivers that were made available under the three prior HUD memos. The recipient of grant funds must notify Alanna Kabel (CPD Director of the Hartford Field Office) in writing no less than two calendar days before using the waiver flexibility. **WAIVER REQUESTS MUST BE SUBMITTED TO:** CPD_COVID-19WaiverHAT@hud.gov.

COC GRANTEES MUST NOTIFY HUD AND CT BOS OF INTENT TO UTILIZE WAIVERS.

The Connecticut Department of Housing (DOH) and Department of Mental Health and Addiction Services (DMHAS) previously notified HUD of their intent to use the available waivers. Both agencies have also notified HUD of their intent to use all newly available extensions. This notification covers all DMHAS and DOH CoC and ESG projects.

NOTE: DOH/DMHAS SUBRECIPIENTS SHOULD NOT SUBMIT WAIVER NOTIFICATIONS TO HUD.

Subrecipients of ESG funds administered by a recipient **other than DOH**, should coordinate with the relevant ESG recipient to determine what waivers they intend to use.

If your agency has a CoC grant agreement directly with HUD, you must submit a notification to HUD that you will be using the flexibility provided by the waivers and specify the waivers you will be implementing. CT BOS has provided a [waiver notification template](#) for this purpose. Agencies that have a CoC grant agreement directly with HUD are encouraged to use the materials created by CT BOS.

HUD approval is not necessary – only notification. Providers can proceed to use the available waivers two calendar days after the grant recipient submits the notification to HUD.

Please note that DMHAS, DOH, and /or CTBOS may re-visit use of these waivers at a later date. Please do not hesitate to reach out to us at ctboscoc@gmail.com, if you have any questions.

Please see also the attachment beginning on page 3.

Attachment		
CoC and ESG Program Waivers for Covid-19		
Program Component/Budget Line Item Affected	Waived Requirement	Duration of Waiver
All CoC Projects	<i>Participant self-certification of income.</i> Requirement to only rely on self-certification of income if source and third-party documentation of income are unobtainable is waived.	Effective through 9/30/21
CoC Leasing and Rental Assistance Budget Line Items & ESG RRH	<i>Use owner certification in lieu of initial HQS inspection.</i> Requirement that CoC projects physically inspect to assure that units meet HQS before any assistance is provided is waived. To use this waiver, recipients and subrecipients must meet certain criteria (see page 3 in the memo located here for details).	Effective through 9/30/21
CoC RRH	Suitable dwelling size requirements waived for RRH. The requirement that each unit assisted have at least one bedroom or living/sleeping room for each two persons is waived for RRH leases executed between 6/30/21 and 12/31/21.	Extends until the later of 1) the end of the initial term of the lease; or 2) 12/31/21.
All CoC Projects and ESG RRH	Homeless status is retained for up to 120 days for people exiting an institution. An individual may qualify as literally homeless as long as they are exiting an institution where they resided for 120 days or less and resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.	Effective through 12/31/21
CoC RRH Rental Assistance	24-month Rental Assistance restriction. Program participants who have reached 24 months of rental assistance and who will not be able to afford their rent without additional rental assistance will be eligible to receive rental assistance until 12/31/21.	Effective through 12/31/21

<p>ESG RRH Rental Assistance</p>	<p>The ESG CV Notice established that program participants who receive the maximum amount of assistance (24 months within 3 years) between January 21, 2020 and March 1, 2021 may receive an additional 6 months of rental assistance and services.</p>	<p>Applies to ESG RRH participants who receive the maximum amount of assistance (24 months within 3 years) between January 21, 2020 and March 1, 2021</p>
<p>All CoC Projects</p>	<p>Grant Amendments All CoC projects that amend their grant agreement in response to COVID-19 between March 31, 2020 and December 31, 2021 to move funds between budget line items may apply in the next CoC Competition based on the Budget Line Items before they were amended.</p>	<p>Applies to grant agreement amendments executed between 3/31/20 and 12/31/21</p>
<p>CoC Permanent Supportive Housing</p>	<p>Change to DedicatedPLUS Eligibility For Dedicated Plus projects awarded in the 2018 and 2019 competitions, people who were chronically homeless prior to entering TH will qualify as Dedicated Plus regardless of whether or not the TH is being eliminated.</p>	<p>Applies to Dedicated Plus projects awarded in the 2018 and 2019 competition – expiration date varies by project and is determined by grant end date.</p>
<p>CoC Leasing Budget Line Item</p>	<p>FMR for Individual Units and Leasing Costs Units assisted under leasing may rent for more than the applicable FMR provided that the rent passes rent reasonableness test.</p>	<p>Effective through 12/31/21</p>
<p>CoC Permanent Supportive Housing</p>	<p>Disability Documentation for PSH Disability determination can be based solely on staff-recorded observation of disability. Other documentation does not have to be provided within 45 days. A written certification by the individual seeking assistance that they have a qualifying disability is acceptable documentation to initiate assistance.</p>	<p>Effective through 12/31/21</p>
<p>CoC Supportive Services Budget Line Item</p>	<p>Limit on Eligible Housing Search and Counseling CoC Program funds may be used for up to 6 months of a program participant’s utility arrears and up to 6 months of program</p>	<p>Effective through 12/31/21</p>

	participant’s rent arrears, when those arrears make it difficult to obtain housing.	
CoC & ESG Rapid Rehousing	<i>RRH Monthly Case Management</i> Program participants are not required to meet at least monthly with their case manager.	Effective through 9/30/21
CoC Leasing and Rental Assistance Budget Line Items & ESG RRH	<i>HQS Re-Inspection of Units</i> Requirement to annually reinspect for HQS is waived	Effective through 9/30/21
CoC Permanent Supportive Housing & CoC & ESG Rapid Re-Housing	<i>One-Year Lease Requirement.</i> Initial term of all leases must now be at least one month.	Effective through 12/31/21