Ohio Balance of State Continuum of Care Coronavirus Disease 2019 (COVID-19) Updated Guidance Available

Purpose of this Listserv Message

This message informs CoC members of the availability of updated guidance related to COVID-19 preparedness.

Target Audience

All homeless assistance projects in the Ohio BoSCoC.

HUD Issues Availability of Regulatory Waivers

HUD issued a memorandum providing regulatory waivers of certain Continuum of Care (CoC), Emergency Solutions Grant (ESG), Housing for Persons With AIDS (HOPWA), and Consolidated Plan requirements to help prevent the spread of COVID-19 and to provide additional supports to individuals and families eligible for CoC, ESG, and HOPWA assistance who are economically impacted by COVID-19.

All recipients of CoC, ESG, and HOPWA program funding should read the memorandum ASAP, but following is a brief list of some of the waivers that are available:

Continuum of Care Program

- Monthly Case Management Requirement for RRH
 - The requirement that program participants meet with a case manager at least once per month may be waived
- Housing Quality Standards (HQS) inspections
 - The initial physical inspection may be waived for the next 6 months
 - Recipients may use technology, such as video streaming, to ensure a unit meets HQS
 - o The annual inspection may be waived for next year
- Lease Terms
 - The requirement that an initial lease term for permanent housing projects be at least one year may be waived for the next 6 months
- Disability Documentation for PSH
- PSH clients must have a documented disability to be eligible for PSH
 - When documentation of disability is the intake worker's observation, the regulation requires the recipient to obtain additional confirming evidence within 45 days.
 - The requirement that intake staff-recorded observation of disability be confirmed and accompanied by other evidence no later than 45 days from the application for assistance documentation requirement may be waived for the next 6 months

Emergency Solutions Grant Program

For HCRP grantees in the Ohio BoSCoC, ODSA will make the wavier requests to HUD. More detailed information is forthcoming.

- Rent Assistance Limited to Units at FMR or Below
 - The FMR restriction may be waived for the next 6 months
- Monthly Case Management Requirement for RRH and HP
 - The requirement that program participants meet with a case manager at least once per month may be waived

Requesting Waivers

Recipients (ie, grantees) interested in using one of the permitted waivers must provide notification in writing, via email or mail, to the CPD Director of the HUD Field Office no less than 2 days before the recipient anticipates using the waiver flexibility. Please review the memorandum and appendix for more details about what must be included in the waiver request and additional program-level documentation requirements.

COVID-19 Planning and Response Guidance for Ohio BoSCoC Providers

The Ohio BoSCoC team is in the process of updating the following resources on the Ohio BoSCoC webpage at https://cohhio.org/boscoc/covid19/ with the information outlined above.

- Ohio BoSCoC COVID-19 Guidance for Homeless System Providers
- FAQ for COVID-19 Preparedness for Ohio BoSCoC Homeless Assistance Providers

All guidance related to COVID-19 preparedness can be found at https://cohhio.org/boscoc/covid19/.

Questions can be directed to Erica Mulryan, COHHIO, at ericamulryan@cohhio.org.