



Chicago Continuum of Care Interim Recordkeeping Standard Operating Guidance in Emergency Situations

The Chicago Continuum of Care (CoC) has developed the following interim guidance regarding recordkeeping in emergency situations. The first priority of housing providers is to continue to house participants during an emergency.

This interim guidance was developed in partnership with the local Department of Housing and Urban Development (HUD) Community Planning and Development (CPD) office and should be utilized until HUD's Office of Special Needs Assistance Programs (SNAPS) provides further guidance.

The following interim guidance ensures accordance with 24 CFR 578.103(a). Agencies must establish standard operating procedures that ensure that Continuum of Care program funds are used in accordance with the requirements of 24 CFR 578 and that sufficient records will be maintained to enable HUD to determine whether the agency, as a Recipient or Subrecipient, are meeting the requirements of this part. During emergency situations, agencies should make every effort to ensure the order of preference for documentation is maintained.

The Chicago CoC recommends that following types of documentation be included during Emergency Situations such as disasters and health crises:

- a. Identification (birth certificate, State ID, etc.)
- b. Income
- c. Disability
- d. Homeless Documentation
- e. Housing Inspections
- f. Annual assessments and/or service plan updates
- g. Leases (copy of)

Recommended Steps

1. Agencies must establish an Emergency Recordkeeping Protocol as part of an Emergency Policies & Procedures that outlines the types of documentation included during an Emergency Situation. This protocol will include an Emergency Recordkeeping Protocol Template (see sample below).
2. Agencies will determine when an Emergency Situation occurs.
3. During the emergency, agencies will be working under their agency's Emergency Policies and Procedures, which includes an Emergency Recordkeeping Protocol.



4. During the emergency, agencies will describe the types of documentation impacted by the emergency situation and how the agency will make best efforts, given the emergency, to maintain records for the impacted types of documentation, including any guidance issued by HUD related to the emergency. These types of documentation must be outlined on their Emergency Recordkeeping Template (See sample below).
5. Staff will use the Emergency Recordkeeping Template to record attempts made to collect documentation for each participant, in each of the documentation areas listed. Staff may need to document attempts for multiple types of documentation for one participant and therefore it may be necessary to utilize multiple Emergency Recordkeeping Templates to ensure clarity of effort. Each documentation of attempt may include a copy of the Emergency Recordkeeping Template, with the documentation of attempt to obtain documentation attached. Documentation of attempt or effort to obtain documentation should include the following:
 - a. Document why you cannot complete or acquire the types of documentation and your attempts to acquire. This may include written case notes, letter, emails, etc. Case notes should reflect the emergency situation, the emergency protocol is active and relevant dates.
 - b. Place that documentation in the file or add it to the case notes if the file is not immediately available.
 - c. Attempts should be made and documented until the emergency situation ends.
6. Agency determines the Emergency Situation has ended. This determination will be documented on the Emergency Recordkeeping Protocol Template.
7. Staff will go back and acquire the documentation needed to meet the non-emergency type of documentation and ensure all documentation is present in case notes and file. Staff will attach the Emergency Recordkeeping Template and all emergency recordkeeping documentation to the document(s) to fulfill the type of documentation. If proper documentation cannot be obtained at this point, staff will explain in the case notes and file why that is the case.



SAMPLE

Continuum of Care Recordkeeping Standard Operating Procedures – Emergency Recordkeeping Protocol

In accordance with 24 CFR 578.103(a), we have established standard operating procedures that ensure that Continuum of Care program funds are used in accordance with the requirements of 24 CFR 578 and that sufficient records will be maintained to enable HUD to determine whether we, as a Recipient or Subrecipient, are meeting the requirements of this part.

As part of those policies and procedures, this Emergency Protocol outlines the recordkeeping procedures we will utilize during an Emergency Situation.

- 1. Determination of Emergency Situation** – Implementation of these Emergency Recordkeeping Protocols will begin with the determination by [insert official who will decide – Executive Director; President of the Board] or in the event that said person is unavailable, by [insert secondary official]. This determination will be made on the Emergency Recordkeeping Protocol Template, which will describe the reasons for invoking the Emergency Recordkeeping Protocols and the date they were invoked.
- 2. Delineation of Emergency Recordkeeping Protocol** –The Emergency Recordkeeping Protocol Template will describe the recordkeeping policies impacted by the emergency situation and how this organization will make best efforts, given the emergency, to maintain records for the impacted policies and procedures, including any guidance issued by HUD related to the emergency.
- 3. Cessation of Emergency Situation** – Emergency Recordkeeping Protocols will cease upon determination by [insert official who will decide – Executive Director; President of the Board] or in the event that said person is unavailable, by [insert secondary official]. This determination will be documented on the Emergency Recordkeeping Protocol Template.

S



SAMPLE

**Continuum of Care Recordkeeping Standard Operating Procedures –
Emergency Recordkeeping Protocol
Emergency Recordkeeping Protocol Template**

In accordance with our Continuum of Care Recordkeeping Standard Operating Procedures – Emergency Recordkeeping Protocol, the determination of an Emergency for purposes of implementing this protocol is outlined herein.

Description of Emergency Situation:

Name & Title of Authorizing Official:

Signature:

Date:

Description of Recordkeeping Policies and Procedures Impacted by the Emergency:

Description of Best Efforts That Will Be Used to Maintain Records for Impacted Policies and Procedures:

SA

Cessation of Emergency Situation

Name & Title of Authorizing Official:

Signature:

Date: