Chicago CoC Program Q&A: HUD Waiver, Grant Amendments & Other COVID-19 Topics

April 21, 2020
2:00-3:00pm
This webinar will begin in 15 minutes

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Chicago CoC Program Q&A: CoC Policy, HUD Waiver, & Expediated Grant Amendment Process

April 20, 2020
2:00-3:00pm
Webinar Housekeeping

• Muted

• Use *6 if you are on a PHONE to mute

• Audio Troubleshooting
  
  • If you are having difficulty hearing us, please join the webinar via phone
  
  • Click on “Audio” and then click “Telephone”. Please follow dial in instructions
  
  • If you are on the phone, please do not put us on HOLD.

• Questions

• In the Questions/Chat Box
Questions/Chat

- All lines are muted
- Use the Question/Chat Box to submit questions, ideas, comments, resources, etc.
Goals

- Overview of New CoC Policy
- HUD CoC Expedited Grant Amendment Process
- HUD Waivers
CoC Policy – Expedited Housing Initiative
Expedited Housing Initiative

• In its April meeting, the CoC Board endorsed a series of adjustments for our system that will influence the way people access permanent housing (PSH & RRH).

• The adjustments will expedite housing placements & ensure our system remains nimble during this crisis.

• All Chicago is tasked with facilitating the system and provider adjustments.
System Adjustments

All Chicago, CSH and the Center for Housing and Health will coordinate these efforts through the Action Agenda Implementation Structure and in conjunction with City Departments.

All Chicago and its partners will begin working on:
- Changing coordinated entry prioritization and expedited matching.
- System-wide landlord engagement with city support.
- Increasing the usage and flexibility of bridge and rapid rehousing.
- Supporting efforts to reduce system-wide barriers to housing (i.e. ID and documentation requirements).
Provider Adjustments

All Chicago will provide technical assistance, guidance and manage accountability for these areas.

Providers should begin to:

• Leverage available waivers to bypass regulatory requirements to house people quickly (i.e. disability documentation, FMR, etc.).

• Waive any non-regulatory requirements to accessing housing and document what is being waived.

• Identify ways to connect to this system effort (ideas are outlined in Provider Next Steps below).
Next Steps for All Chicago

• Develop a COVID-19 Expedited Housing Initiative Accountability Outline

• Work with partners to identify if any amendments to coordinated entry prioritization are necessary to account for vulnerability due to COVID-19

• Work with partners to coordinate a city-wide centralized landlord engagement effort

• Work on the system level to identify regulatory barriers and make requests to funders for waivers
Next Steps for Providers

• Implement Emergency Recordkeeping Protocols
• Apply for HUD Waivers
• If any staff have capacity to redirect efforts towards centralized landlord engagement strategies, notify CoCprograms@allchicago.org
• Convene an internal committee to identify ways your process can be expedited or changed (track and document updates to internal procedures)
• Get involved in the Action Agenda to help shape this initiative
• Once available, review the Accountability Outline and act accordingly
HUD CoC Expedited Grant Amendment
HUD CoC Grants Expedited Process

HUD has allowed for grant amendments to FY 2018 executed grant agreements to meet the immediate client health and safety needs

• HUD will soon release guidance on FY 2019 grants
• Changes to budget line items are temporary
• Changes to operating start date is permanent
Steps for the HUD CoC Expedited Grant Amendment Process

1. Download the grant agreement amendment request package for the specific HUD CoC grant which you will use
2. Complete the grant amendment request form
3. Sign the grant amendment request form
4. Email the completed grant amendment request form to your Field Office Inbox and CC your CPD Representative
1. Download the grant agreement amendment request package for the specific HUD CoC grant

- Review Grant Agreement Amendment Request Package
  - Each grant amendments have been separated by agency
  - Find your agency’s contract: https://drive.google.com/drive/folders/1HTW0Qssj7To8mW WuH69ZT_mxNkykQlf
2. Complete the grant amendment request form

- Find pre-populated grant number
  - Confirm grant number, tax ID number, DUNS number and recipients name
- Delete any other grants you do not want to amend
- Review highlighted instructions and delete text as directed
- Under the “Recitals” section – choose terms of the agreement you wish to edit
3. Sign the Grant Amendment Request Form

• Each grant must be signed on signature page

• Authorized official must sign and date document

  1. Print, sign and scan with signature and add it to the document submitted
  2. Add an electronic signature
4. Email the completed grant amendment request form

- Email completed grant agreement amendment request form to CPD_COVID-19AmendmentCHI@hud.org
  
  Please CC local CPD HUD Rep

- Ensure signature page is included in each grant amendment
After Submission

1. HUD will review grant amendment requests
   - Review for completeness
   - May contact you for questions

2. Provide executed grant amendment copies by email
Questions?
HUD Waivers – Information and Q&A
HUD Waivers – Goals of this Section

• Provide clarifying information about HUD Waivers
• Review guidance on Emergency Recordkeeping Policies
• Take audience questions about HUD Waiver implementation
Recipient Level Documentation

1. A copy of the waiver notification letter the agency sent to HUD.
2. The agency’s Emergency Recordkeeping Policies and Procedures.
3. As applicable, documentation of the constraints/barriers/limitations that make it necessary to use the waivers or Emergency Recordkeeping Policy.

For example:
- Shelter in place orders (Governor's Order: [https://www2.illinois.gov/IISNews/21288-Gov._Pritzker_Stay_at_Home_Order.pdf](https://www2.illinois.gov/IISNews/21288-Gov._Pritzker_Stay_at_Home_Order.pdf))
- Office closures
- Limited staff capacity
Client Level Documentation

• Notes in files of affected clients outlining application of the waiver and demonstrating that it falls within the timeframe.
  “Example: [Initials] was [enrolled/housed/assisted] on [Date(s)] during the COVID-19 pandemic. HUD Waiver [name waiver] applies. See Recipient Level documentation for Waiver Notification and Emergency Recordkeeping Policy.”

• Details/documents related to the specific waivers applied, such as:
  • Copies of leases displaying date of execution (for leases above FMR)
  • Completed HQS inspection forms noting the method of observation, date, and a reference to the waiver (for HQS completed with technology)
Maintain **Recipient Level Documentation** and **Client Level Documentation**

For example, when waiving the FMR restriction (when using grant funds to leasing individual units):

<table>
<thead>
<tr>
<th>Suggested Recipient Documentation</th>
<th>Suggested Client Level Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) Documentation that FMR limits are impeding grantee’s ability to find units for clients as a result of COVID-19;</td>
<td>1) A copy of the lease clearly displaying the date of execution;</td>
</tr>
<tr>
<td>2) Copy of waiver notification sent to HUD;</td>
<td>2) A note to file noting the date of the COVID-19 Memorandum and its application to the client’s lease;</td>
</tr>
<tr>
<td>3) Emergency recordkeeping policies and procedures</td>
<td>3) A completed rent reasonableness analysis.</td>
</tr>
</tbody>
</table>
Emergency Recordkeeping Protocol

An agency’s Emergency Policies & Procedures should include an Emergency Recordkeeping Protocol & Template. The protocol describes how the agency uses the template during an emergency to document:

• A determination of the start of the emergency.
• A description of the types of records impacted by the emergency.
• A description of efforts that will be used to maintain impacted records (i.e., documenting attempts, adjustments to procedures, procedures to acquire documentation afterwards, etc.).
• A determination of the cessation (end) of the emergency.
Looking for more?

• View the slides and recording from HUD’s April 14 Webinar

• View All Chicago’s Webinar Summary from HUD’s April 14 Webinar

• View All Chicago’s Interim Recordkeeping Standard Operating Guidance, including sample protocol and template.
Questions & Answers

What questions do you have about implementing HUD Waivers?
THANK YOU!

- Contact us at CoCPrograms@allchicago.org