CoC, ESG, TANF, and CSB COVID-19 Waivers

Partner agencies can include the below checklist in client files to indicate use of a COVID-19 waiver. Use of this checklist is not required – it’s an optional tool. The documentation cited below is required in client files, regardless of whether partners choose to use this checklist.

Refer to CSB’s Interim Guidance on COVID-19 for RRH, HP, and PSH Projects, available on CSB’s website [here](#), for additional details.

HUD’s Memoranda on the waivers are available [here](#) and [here](#) and [here](#).

The Governor of Ohio declared a public health emergency on March 9, 2020 via [Executive Order 2020-01D](#). On April 2, 2020; May 27, 2020; and October 2, 2020 CSB notified HUD of the intent to access the CoC and ESG waiver flexibilities below. The City of Columbus, Franklin County, and State of Ohio also notified HUD of the intent to access waivers. On April 7, 2020 CSB acknowledged the Ohio Department of Job and Family Services TANF waiver below.

### Continuum of Care (CoC)

<table>
<thead>
<tr>
<th>Check if applicable</th>
<th>Waiver</th>
<th>Notes</th>
<th>Documentation</th>
<th>Expiration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disability Determination for PSH</td>
<td>Clients entering PSH after 3/31/20 can self-certify disability; case managers do not have to obtain third-party documentation when the crisis ends</td>
<td>Client self-certification and staff signature and date as confirmation; justification for inability to get third-party documentation (e.g., Executive Order 2020-01D demonstrating public health emergency)</td>
<td>When public health emergency ends</td>
<td></td>
</tr>
<tr>
<td>RRH Monthly Case Management</td>
<td>Continue to check with clients via phone/text/email</td>
<td>n/a</td>
<td>12/31/2020</td>
<td></td>
</tr>
<tr>
<td>HQS Initial Physical Inspection of Unit</td>
<td>Physical inspection required within 3 months after the public health emergency ends</td>
<td>Landlord self-certification</td>
<td>12/31/2020</td>
<td></td>
</tr>
<tr>
<td>HQS Re-Inspection of Units</td>
<td>Annual re-inspections are not required; continue to address maintenance issues and client concerns</td>
<td>n/a</td>
<td>3/31/2021</td>
<td></td>
</tr>
<tr>
<td>Limit on Eligible Housing Search and Counseling Services</td>
<td>Use of waiver requires CSB pre-approval; can pay for up to 6 months of rental arrears and 6 months of utility arrears under supportive services</td>
<td>Justification related to COVID-19 and CSB approval</td>
<td>3/31/2021</td>
<td></td>
</tr>
<tr>
<td>FMR for Individual Units and Leasing Costs</td>
<td>Use of waiver requires CSB pre-approval. Rent reasonableness standard still applies.</td>
<td>Justification related to COVID-19; lease dated between 3/31/20 and 12/31/20; and CSB approval</td>
<td>12/31/2020</td>
<td></td>
</tr>
<tr>
<td>One-Year Lease Requirement for PSH and CoC-funded RRH</td>
<td>Use of waiver requires CSB pre-approval</td>
<td>Justification related to COVID-19; lease dated between 3/31/20 and 12/31/20; and CSB approval</td>
<td>12/31/2020</td>
<td></td>
</tr>
<tr>
<td>Third-Party Documentation of Income</td>
<td>Clients can self-certify income if source or third-party documentation is unobtainable</td>
<td>n/a</td>
<td>12/31/2020</td>
<td></td>
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</tr>
<tr>
<td>Suitable Dwelling Size</td>
<td>RRH only; waiver to requirement for each unit to have at least one bedroom or living/sleeping room for each two persons</td>
<td>n/a</td>
<td>End of the lease or 12/31/2020, whichever is later</td>
<td></td>
</tr>
<tr>
<td>Homelessness Definition – Stays in Institutions of 90 days or less. CH definition does not change.</td>
<td>Extended to 120 days or less</td>
<td>Documentation of entry into and exit from institution; documentation of homelessness prior to entry into institution</td>
<td>3/31/2021</td>
<td></td>
</tr>
</tbody>
</table>

**Emergency Solutions Grant (ESG)**

<table>
<thead>
<tr>
<th>Check if applicable</th>
<th>Waiver</th>
<th>Notes</th>
<th>Documentation</th>
<th>Expiration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing Stability Case Management</td>
<td>Continue to check with clients via phone/text/email</td>
<td>n/a</td>
<td>8/31/2020</td>
<td></td>
</tr>
<tr>
<td>Restriction of Rental Assistance to Units with Rent at or Below FMR</td>
<td>Use of waiver requires CSB pre-approval. Rent reasonableness standard still applies.</td>
<td>Justification related to COVID-19; lease dated between 3/31/20 and 9/30/20; and CSB approval email</td>
<td>9/30/2020</td>
<td></td>
</tr>
<tr>
<td>Homelessness Definition – Stays in Institutions of 90 days or less</td>
<td>Extended to 120 days or less</td>
<td>Documentation of entry into and exit from institution; documentation of homelessness prior to entry into institution</td>
<td>3/31/2021</td>
<td></td>
</tr>
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</table>

**Emergency Solutions Grant (ESG) – COVID-19 (CV)**
These flexibilities apply to **only ESG-CV funds**, not regular ESG funds. ESG-CV funds will be clearly identified in partner agency contracts. If in doubt, please contact CSB.

<table>
<thead>
<tr>
<th>Check if applicable</th>
<th>Additional Eligible Activities and Waivers</th>
<th>Notes</th>
<th>Documentation</th>
<th>Expiration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Temporary shelters and hotel/motel used as emergency shelter</td>
<td>Applies to social distancing shelter and shelter for isolation and quarantine; funds managed by CSB</td>
<td>Documentation that the structure used met the definition of temporary emergency shelter during the time it was so used</td>
<td>1/31/2022</td>
<td></td>
</tr>
<tr>
<td>Training</td>
<td>Training on infectious disease prevention and mitigation for staff working directly to prevent, prepare for, and respond to COVID-19 among people experiencing or at risk of homelessness</td>
<td>Normal cost documentation; categorized as operational costs instead of administrative costs</td>
<td>6/30/2022</td>
<td></td>
</tr>
<tr>
<td>Hazard pay</td>
<td>Additional pay for staff working directly to prevent, prepare for, and respond to COVID-19</td>
<td>Normal payroll and benefits documentation</td>
<td>6/30/2022</td>
<td></td>
</tr>
<tr>
<td><strong>COVID-19 among people experiencing or at risk of homelessness</strong></td>
<td>Normal cost documentation; total incentive cannot exceed three times the rent charged for the unit</td>
<td>6/30/2022</td>
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</tr>
<tr>
<td><strong>Landlord incentives</strong></td>
<td>Signing bonuses equal to up to 2 months of rent; security deposits equal to up to 3 months of rent; payment to repair damages incurred by participant not covered by the security deposit or that are incurred while the participant is still residing in the unit; extra cleaning or maintenance of unit or appliances</td>
<td>Normal cost documentation</td>
<td>6/30/2022</td>
<td></td>
</tr>
<tr>
<td><strong>Volunteer incentives</strong></td>
<td>Cash or gift cards for volunteers</td>
<td>Normal cost documentation</td>
<td>6/30/2022</td>
<td></td>
</tr>
<tr>
<td><strong>Rental Assistance</strong></td>
<td>Cannot exceed 12 months</td>
<td>n/a</td>
<td>6/30/2022</td>
<td></td>
</tr>
<tr>
<td><strong>Fair Market Rent</strong></td>
<td>Use of waiver requires CSB pre-approval. Rent reasonableness standard still applies</td>
<td>Justification related to COVID-19; lease dated between 3/31/20 and 6/30/2022; and CSB approval</td>
<td>6/30/2022</td>
<td></td>
</tr>
<tr>
<td><strong>RRH Monthly Case Management</strong></td>
<td>Continue to check with clients via phone/text/email</td>
<td>n/a</td>
<td>6/30/2022</td>
<td></td>
</tr>
</tbody>
</table>

**Temporary Assistance for Needy Families (TANF)**

<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>Verbal self-attestation for ODJFS TANF Eligibility Form for TANF Funded Services</td>
<td>Partners must ask each question on the form and indicate the answer, initial each section of the form</td>
<td>Eligibility form initialed and signed by case manager</td>
<td>When public health emergency ends</td>
<td></td>
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</tbody>
</table>

**CSB**

<table>
<thead>
<tr>
<th>Check if applicable</th>
<th>Waiver</th>
<th>Notes</th>
<th>Documentation</th>
<th>Expiration</th>
</tr>
</thead>
<tbody>
<tr>
<td>At Risk of Homelessness Documentation for HP programs</td>
<td>If a household is doubled-up, staff can verbally confirm with the host family that the client must leave</td>
<td>Verbal at-risk certification signed and dated by case manager, including host family name, address, phone number, and specific date when the household must leave</td>
<td>When public health emergency ends</td>
<td></td>
</tr>
<tr>
<td>Case management, IHSPs, annual assessments, case closures</td>
<td>Engage via phone or electronically when possible</td>
<td>Document both successful engagement and engagement attempts, as usual</td>
<td>When public health emergency ends</td>
<td></td>
</tr>
<tr>
<td>Client consent</td>
<td>For any paperwork usually signed by the client, case managers can document verbal consent</td>
<td>Case manager writes “verbal consent received” and signs/dates paperwork</td>
<td>When public health emergency ends</td>
<td></td>
</tr>
<tr>
<td>Client identification documents</td>
<td>Photos are acceptable if copies cannot be obtained</td>
<td>n/a</td>
<td>When public health emergency ends</td>
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</tr>
<tr>
<td>Verification of custody of minor children</td>
<td>Not required by CSB; landlord may require prior to move in</td>
<td>n/a</td>
<td>When public health emergency ends</td>
<td></td>
</tr>
<tr>
<td>Verification of veteran status</td>
<td>Not required by CSB; landlord may require prior to move in</td>
<td>n/a</td>
<td>When public health emergency ends</td>
<td></td>
</tr>
</tbody>
</table>

For reference, the following eviction moratoria have been in place during the COVID-19 pandemic.

<table>
<thead>
<tr>
<th>Moratorium</th>
<th>Notes</th>
<th>Documentation</th>
<th>Timeframe</th>
</tr>
</thead>
<tbody>
<tr>
<td>CARES Act</td>
<td>Cannot evict tenants for non-payment of rent in federally assisted housing</td>
<td>If a tenant is evicted from PSH, document the reason for eviction, retention plans, and eviction prevention measures that were attempted</td>
<td>3/27/20–7/24/20</td>
</tr>
<tr>
<td>Centers for Disease Control and Prevention</td>
<td>Cannot evict tenants for non-payment of rent if they meet the conditions in the CDC Order</td>
<td>Declaration signed by the tenant confirming that they meet the conditions in the CDC order (contact CSB if you need a sample declaration form). If a tenant is evicted from PSH, document the reason for eviction, retention plans, and eviction prevention measures that were attempted</td>
<td>9/4/20–12/31/20</td>
</tr>
</tbody>
</table>