

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)

Check if applicable	Waiver	Notes	Documentation	Expiration
	Disability Determination for PSH	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	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)	When public health emergency ends
	RRH Monthly Case Management	Continue to check with clients via phone/text/email	n/a	12/31/2020
	HQS Initial Physical Inspection of Unit	Physical inspection required within 3 months after the public health emergency ends	Landlord self-certification	12/31/2020
	HQS Re-Inspection of Units	Annual re-inspections are not required; continue to address maintenance issues and client concerns	n/a	3/31/2021
	Limit on Eligible Housing Search and Counseling Services	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	Justification related to COVID-19 and CSB approval	3/31/2021
	FMR for Individual Units and Leasing Costs	Use of waiver requires CSB pre-approval. Rent reasonableness standard still applies.	Justification related to COVID-19; lease dated between 3/31/20 and 12/31/20; and CSB approval	12/31/2020
	One-Year Lease Requirement for PSH and CoC-funded RRH	Use of waiver requires CSB pre-approval	Justification related to COVID-19; lease dated between 3/31/20 and 12/31/20; and CSB approval	12/31/2020

	Third-Party Documentation of Income	Clients can self-certify income if source or third-party documentation is unobtainable	n/a	12/31/2020
	Suitable Dwelling Size	RRH only; waiver to requirement for each unit to have at least one bedroom or living/sleeping room for each two persons	n/a	End of the lease or 12/31/2020, whichever is later
	Homelessness Definition – Stays in Institutions of 90 days or less. CH definition does not change.	Extended to 120 days or less	Documentation of entry into and exit from institution; documentation of homelessness prior to entry into institution	3/31/2021

Emergency Solutions Grant (ESG)

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

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.

Check if applicable	Additional Eligible Activities and Waivers	Notes	Documentation	Expiration
	Temporary shelters and hotel/motel used as emergency shelter	Applies to social distancing shelter and shelter for isolation and quarantine; funds managed by CSB	Documentation that the structure used met the definition of temporary emergency shelter during the time it was so used	1/31/2022
	Training	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	Normal cost documentation; categorized as operational costs instead of administrative costs	6/30/2022
	Hazard pay	Additional pay for staff working directly to prevent, prepare for, and respond to	Normal payroll and benefits documentation	6/30/2022

		COVID-19 among people experiencing or at risk of homelessness		
	Landlord incentives	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	Normal cost documentation; total incentive cannot exceed three times the rent charged for the unit	6/30/2022
	Volunteer incentives	Cash or gift cards for volunteers	Normal cost documentation	6/30/2022
	Rental Assistance	Cannot exceed 12 months	n/a	6/30/2022
	Fair Market Rent	Use of waiver requires CSB pre-approval. Rent reasonableness standard still applies.	Justification related to COVID-19; lease dated between 3/31/20 and 6/30/2022; and CSB approval	6/30/2022
	RRH Monthly Case Management	Continue to check with clients via phone/text/email	n/a	6/30/2022

Temporary Assistance for Needy Families (TANF)

Check if applicable	Waiver	Notes	Documentation	Expiration
	Verbal self-attestation for ODJFS TANF Eligibility Form for TANF Funded Services	Partners must ask each question on the form and indicate the answer, initial each section of the form	Eligibility form initialed and signed by case manager	When public health emergency ends

CSB

Check if applicable	Waiver	Notes	Documentation	Expiration
	At Risk of Homelessness Documentation for HP programs	If a household is doubled-up, staff can verbally confirm with the host family that the client must leave	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	When public health emergency ends
	Case management, IHSPs, annual assessments, case closures	Engage via phone or electronically when possible	Document both successful engagement and engagement attempts, as usual	When public health emergency ends
	Client consent	For any paperwork usually signed by the client, case managers can document verbal consent	Case manager writes "verbal consent received" and signs/dates paperwork	When public health emergency ends

	Client identification documents	Photos are acceptable if copies cannot be obtained	n/a	When public health emergency ends
	Verification of custody of minor children	Not required by CSB; landlord may require prior to move in	n/a	When public health emergency ends
	Verification of veteran status	Not required by CSB; landlord may require prior to move in	n/a	When public health emergency ends

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

Moratorium	Notes	Documentation	Timeframe
CARES Act	Cannot evict tenants for non-payment of rent in federally assisted housing	If a tenant is evicted from PSH, document the reason for eviction, retention plans, and eviction prevention measures that were attempted	3/27/20-7/24/20
Centers for Disease Control and Prevention	Cannot evict tenants for non-payment of rent if they meet the conditions in the CDC Order	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	9/4/20-12/31/20