

Community Shelter Board (CSB) COVID-19 Policies and Procedures CoC, ESG, HOME, TANF, and CSB COVID-19 Waivers

This checklist should be used in conjunction with CSB’s Guidance on COVID-19 for RRH, HP, and PSH Projects, available on CSB’s website [here](#). The Guidance and Checklist together constitute CSB’s COVID-19 Policies and Procedures. 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.

HUD Memoranda on the waivers: [March 31, 2020](#); [May 22, 2020](#); [September 30, 2020](#); [December 30, 2020](#); [March 31, 2021](#); [June 30, 2021](#), [July 19, 2021](#), [September 27, 2021](#), [December 30, 2021](#).

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; October 2, 2020, December 30, 2020; April 2, 2021; July 1, 2021; and December 30, 2021 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/Validity
	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	3/31/2022
	RRH Monthly Case Management	Continue to check with clients via phone/text/email	n/a	9/30/2021
	HQS Initial Physical Inspection of Unit	Physical inspection required by 6/30/22	Landlord self-certification was allowable through 12/30/21. For 12/31/21 – 3/31/22, in-person inspections are still waived, but partners must visually inspect the unit using technology, such as video streaming	3/31/2022
	HQS Re-Inspection of Units	Continue to address maintenance issues and client concerns as needed	No documentation is required for annual re-inspections due before 12/30/21. For 12/31/21 – 3/31/22, in-person inspections are still waived, but partners must visually inspect the unit using technology, such as video streaming	3/31/2022
	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	12/31/2021

	FMR for Individual Units and Leasing Costs	Rent reasonableness standard still applies.	Justification related to COVID-19; lease dated between 3/31/20 and 3/31/22	3/31/2022
	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 3/31/22; and CSB approval	3/31/2022
	Third-Party Documentation of Income	Clients can self-certify income if source or third-party documentation is unobtainable	n/a	9/30/2021
	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 3/31/2022, 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	3/31/2022
	Limit on RRH Rental Assistance	RRH Rental Assistance can exceed 24 months	n/a	3/31/2022

Emergency Solutions Grant (ESG)

Check if applicable	Waiver	Notes	Documentation	Expiration/Validity
	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	Rent reasonableness standard still applies.	Justification related to COVID-19; lease dated between 3/31/20 and 9/30/20 OR 12/30/21 and 3/31/22	9/30/2020 12/30/2021 - 3/31/2022
	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	6/30/2021 12/30/2021 - 3/31/2022
	Program Participant Use of Sub-leases	Clients can enter into sub-leases from a person other than the owner (i.e., a sub-lease with the primary leaseholder)	Legally valid sub-lease with the primary leaseholder for the unit; only allowable for leases/sub-leases entered into between 12/30/21 and 3/31/22	12/30/2021 - 3/31/2022
	Housing Relocation and stabilization services	RRH utility payments and housing stability case management can exceed 24 months	n/a	12/30/2021 - 3/31/2022
	Limit on RRH Rental Assistance to 24 months in a 3-year period	RRH Rental Assistance can exceed 24 months in a 3-year period	n/a	12/30/2021 - 3/31/2022

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	9/30/2022
	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	9/30/2022
	Hazard pay	Additional pay for staff working directly to prevent, prepare for, and respond to COVID-19 among people experiencing or at risk of homelessness	Normal payroll and benefits documentation	9/30/2022
	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	9/30/2022
	Volunteer incentives	Cash or gift cards for volunteers	Normal cost documentation	9/30/2022
	Rental Assistance	Limitation on maximum number of months lifted	n/a	9/30/2022
	Fair Market Rent	Rent reasonableness standard still applies.	Justification related to COVID-19; lease dated between 3/31/20 and 6/30/2022	9/30/2022
	Homelessness Prevention and RRH Monthly Case Management	Continue to check with clients via phone/text/email	n/a	9/30/2022
	PPE for RRH and HP clients	PPE for shelter clients is already allowable	Normal cost documentation	9/30/2022
	Vaccine incentives	Direct cash payments of up to \$50 per dose, only if other vaccine incentives are unavailable or inaccessible in the community	Normal cost documentation, including HMIS IDs for clients who received incentives	9/30/2022

	Furniture and household furnishings for RRH & HP clients	Must be owned by partner and cannot stay with client after they exit. Continue to use Furniture Bank services when possible.	Normal cost documentation; documentation of compliance with 2 CFR 200.313 and agency property disposition policies	9/30/2022
	Cell phones with Internet capability for RRH and HP clients for activities necessary to obtain or maintain housing	Phones must be owned by partner and cannot stay with client after they exit. Wireless service plans must be in the partner's name, not the client's	Normal cost documentation; documentation of compliance with 2 CFR 200.313 and agency property disposition policies	9/30/2022
	Renters insurance for RRH & HP clients	Payment must be necessary to obtain or maintain housing (e.g., the landlord requires insurance) and partners must pay the insurance company directly (not the client)	Confirmation that insurance is necessary and that it was paid to the insurance company	9/30/2022
	Sponsor-based rental assistance for RRH & HP	Partners can enter into a lease for one or more units and house RRH and HP clients in those units. Contact CSB before implementation if this is an option you want to pursue.	Lease, occupancy agreement, and confirmation that the unit is occupied by a client during each month that rent is paid, unless a client leaves the unit prior to the occupancy agreement expiring, in which case rent can be paid for 30 days while working to place another client in the unit.	9/30/2022

HOME

Check if applicable	Waiver	Notes	Documentation	Expiration
	HQS Initial Physical Inspection of Unit	Physical inspection required by 6/30/22	n/a	9/30/21
	HQS Re-Inspection of Units	Physical inspection required by 6/30/22	n/a	12/31/21

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	No expiration. CSB will update HCRS P&Ps to reflect this change.
	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 were in place during the COVID-19 pandemic. - EXPIRED

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.	9/4/20-7/31/21 Although CDC extended the moratorium for areas of high COVID-19 transmission, Franklin County has determined the extension is not enforceable.