

Balance of State Continuum of Care Statewide Membership Meeting

December 18, 2020 Webinar

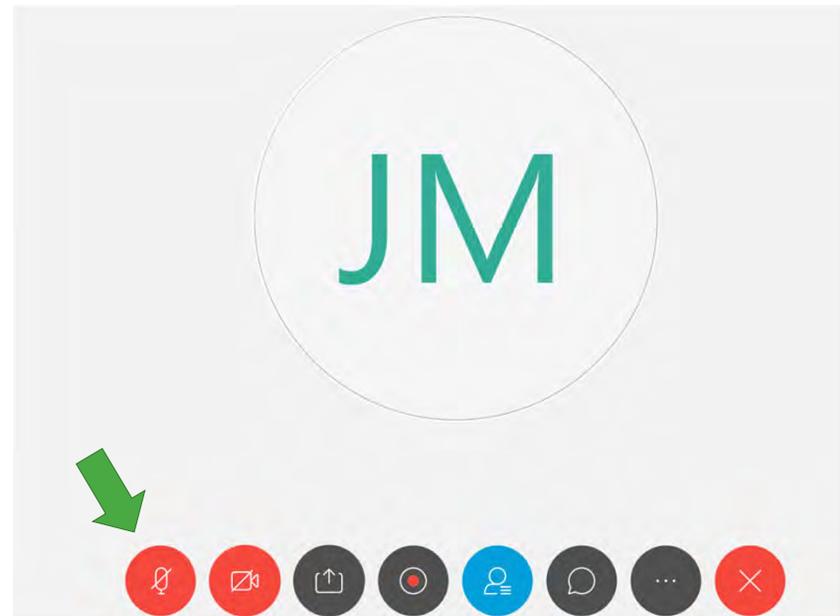
[REGISTRATION LINK](#)

Presented by DCA as Collaborative Applicant



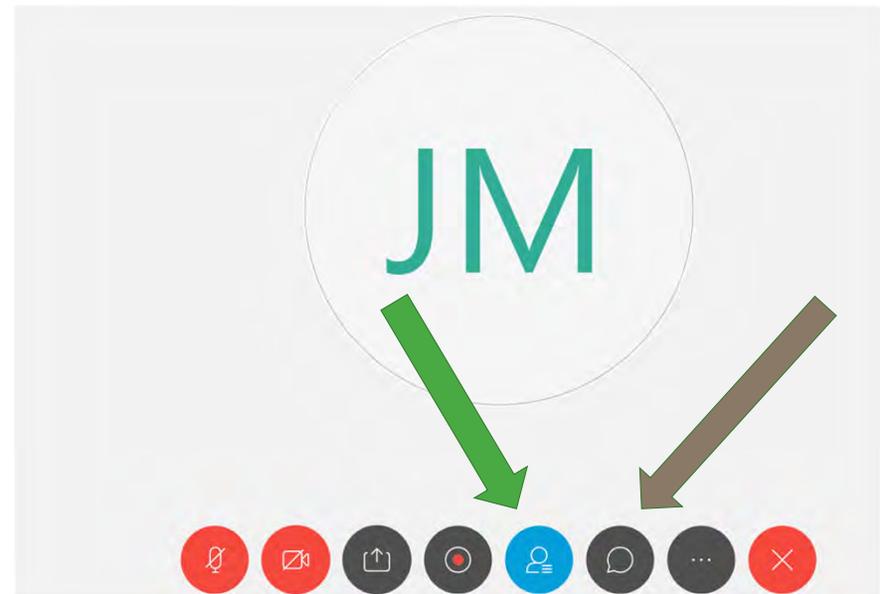
WebEx Introduction

- Notice the menu options at the bottom of your screen
- Please remember to mute yourself unless you are talking
- You are muted if the microphone is red
- You can toggle the mute off and on by clicking the microphone
- Board members MUST unmute and announce name to make motions
- Board members MUST unmute in order to vote



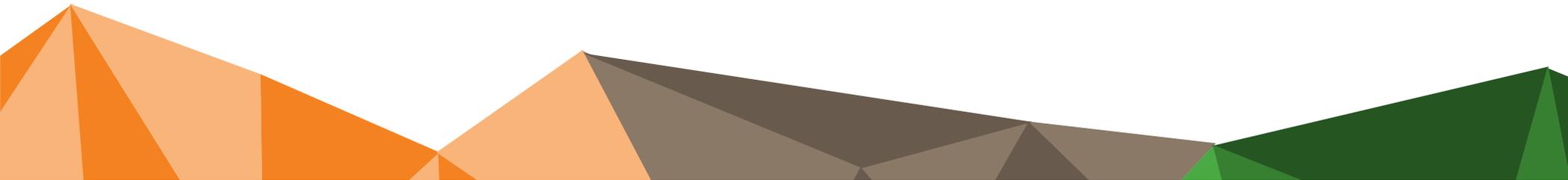
WebEx Introduction

- To view the participants click on the blue participant circle
- To view the chat click on the circle with the chat bubble
- Please make sure chat is set to “Everyone” for discussion



Agenda

- Welcome and Introductions
- COVID-19 and CARES Act Updates
- Balance of State CoC Updates
- Homeless Initiatives in the Balance of State CoC
- Public Comment

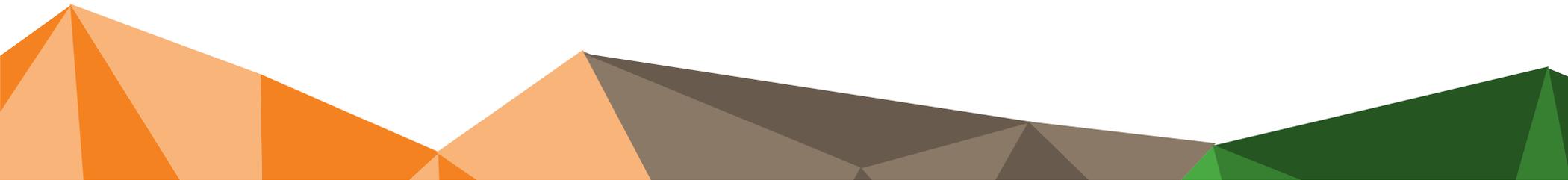


Balance of State Continuum of Care

HUD Continuum of Care

A Continuum of Care (CoC) is established by representatives of relevant organizations within a geographic area to carry out the responsibilities set forth in the CoC Program interim rule.

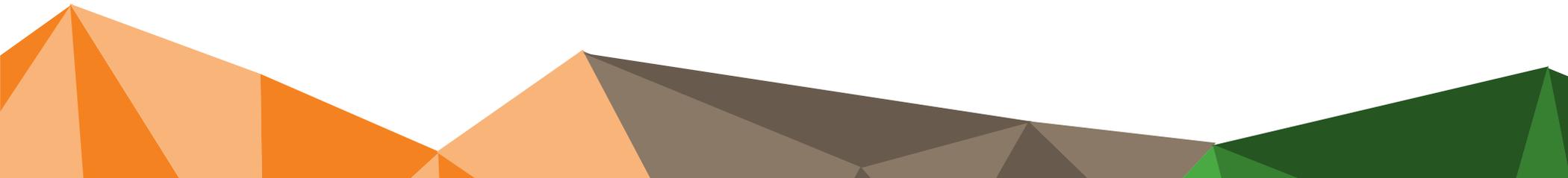
Georgia Balance of State CoC has 152 counties.



HUD Continuum of Care Program

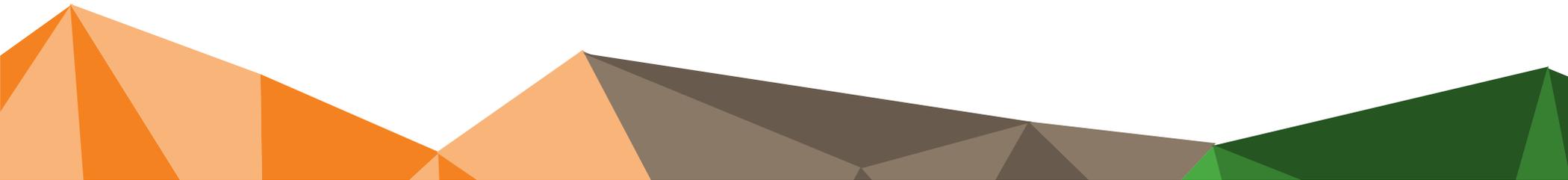
The CoC Program is designed to assist individuals and families experiencing homelessness and to provide the services needed to help them move into permanent housing, with the goal of long-term stability.

- ❑ To develop a **long-term strategic plan and manage a year-round planning effort** that addresses
 - the needs of homeless individuals and households;
 - the availability and accessibility of existing housing and services; and
 - the opportunities for linkages with mainstream housing and services resources.
- ❑ To prepare an **application** for McKinney-Vento Homeless Assistance Act (McKinney-Vento) competitive grants.
- ❑ To have an **independent Board of Directors**, maintain a **written Governance Charter**, set and meet **goals to prevent and end homelessness**, and implement all other requirements of the **HEARTH Act**



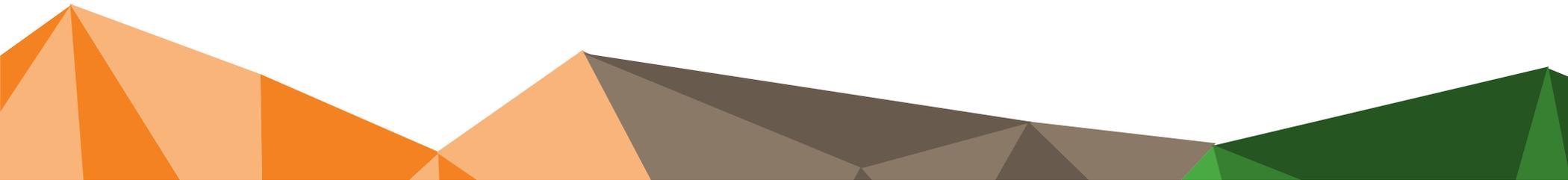
Collaborative Applicant (DCA) Responsibilities

- To provide oversight for the Continuum in order to meet HUD's rule for Continuum of Care and to assure that requirements are met for the annual HUD Continuum of Care funding competition.
- Maintain Continuum membership lists, conduct membership recruitment campaigns targeted to stakeholders, publish agendas for membership meetings, and assist the Board in conducting meetings of full membership not less than twice annually.
- Consult with both ESG Entitlements and HUD Consolidated Planning jurisdictions.
- Implement and coordinate the biennial unsheltered point in time count and the annual shelter survey.
- Provide staff for planning and implementation of HEARTH Act requirements and overall CoC strategies



Membership

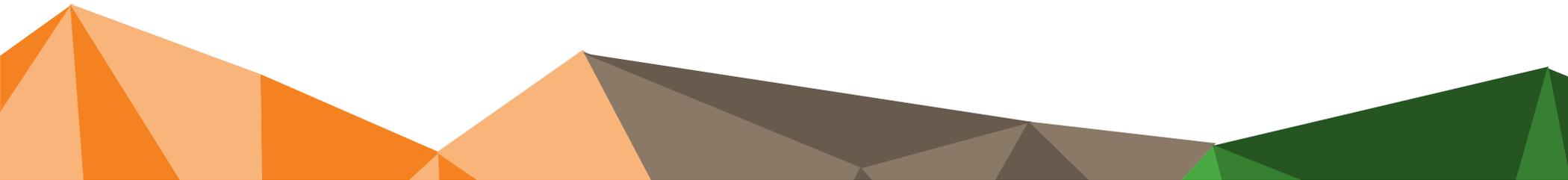
- Formalized process
- Agency representation and individuals
- Voting – Designated voting member (agencies only)
- Participation – Code of Conduct Policy approved May 15th
 - Attend not less than one meeting (membership, Board, Committee, or Subcommittee) per year
 - Agencies can substitute staff for meeting participation
 - Inactive or non-voting members to be reviewed
- CoC-funded providers are expected to participate (membership & attendance)



State COVID-19 Response and CARES Act Funding Updates

COVID-19 Update

- Department of Community Affairs and Balance of State CoC Response to Pandemic
 - Governor's Task Force
 - Other committees
 - Coordination of State agencies
 - Statewide coordination of CoCs and ESG Jurisdictions
 - Resource Identification
 - Continuing activities to distribute ESG-CV funding
 - Receiving feedback from people with lived experience
 - Engaging with new partners
 - Increasing focus on job readiness and training



COVID-19 Update

- Department of Community Affairs COVID-19 Resource Page:
 - <https://www.dca.ga.gov/safe-affordable-housing/homeless-special-needs-housing/covid-19-resources>
 - Basic Info Tab:

COVID-19 Resources

Basic Info FAQs Related Information

COVID-19 Community Resources below are a collaboration of the Department of Community Affairs (DCA), Georgia Emergency Management Assistance (GEMA), Department of Behavioral Health and Developmental Disabilities (DBHDD), and Department of Public Health (DPH).

Click on any of the links and buttons below to access these resources.

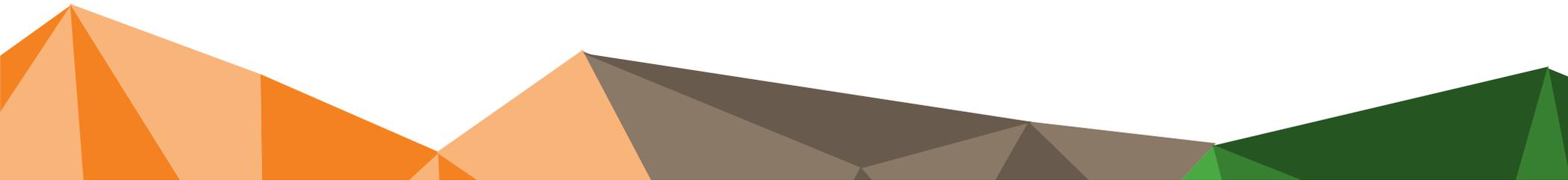
- [Click here for information on the CDC Protections for Tenants Facing Eviction for Nonpayment.](#)
- [Georgia Emergency Management Assistance \(GEMA\) COVID-19 Website](#)
- [COVID-19 Testing Sites-Georgia Department of Public Health](#)
- [Drug Overdose Prevention Resources](#)
- [Homeless Services and Resources Map of Georgia](#)
- [HOPWA Homeless Services and Resources Map of Georgia](#)

Disclaimer: Goods and Services provided on this listing have not been endorsed by DCA and are meant to serve as a resource only. DCA cannot be held responsible for the failure of contractors to perform their duties. Additional due diligence should be undertaken by those procuring any of these goods or services. Vendor participation on this list is considered voluntary. Further, DCA holds no liability for any services provided on this list and therefore holds no liability if anyone should choose to utilize any of these goods or services. There are no expressed written or verbal guarantees that your goods or services will be utilized.



COVID-19 Update

- Department of Community Affairs COVID-19 Resource Page:
 - <https://www.dca.ga.gov/safe-affordable-housing/homeless-special-needs-housing/covid-19-resources>
 - FAQ Tab:
 - How to Protect Yourself from Eviction under the CDC Order
 - Links for information on testing sites, finding masks, jobs, and internet connectivity.
 - Other resources added and removed as necessary

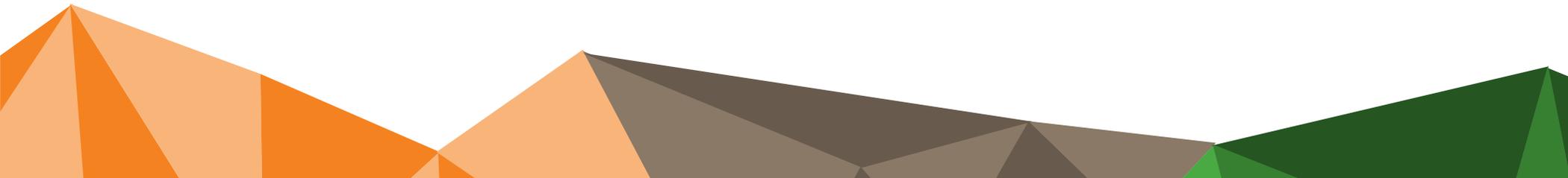


CARES Act ESG and HOPWA Formula Allocations & Supplemental Funding

NAME	ESG-CV1	ESG-CV2	HOPWA-CV
Atlanta	\$2,163,228	\$10,965,024	\$3,317,389
Augusta-Richmond County	\$539,590	\$1,831,311	\$152,172
Macon	\$565,638	\$1,014,779	
Savannah	\$693,166	\$2,103,711	
Clayton County	\$780,931	\$1,674,553	
Cobb County	\$988,062	\$2,284,556	
DeKalb County	\$1,593,790	\$3,818,678	
Fulton County	\$574,624	\$1,955,204	
Gwinnett County	\$1,619,024	\$3,319,598	
Georgia Nonentitlement	\$15,920,176	\$29,498,276	\$562,987

CARES Act Update

- CARES Act was signed into law on March 27, 2020.
- HUD allocations made to Emergency Solutions Grants (ESG) and Housing Opportunities for Persons With AIDS (HOPWA) programs (recipients).
- State ESG (DCA) distributed the ESG CARES Act funding in stages.
 - First round of funding selection criteria for sub-grantees included those with a known capacity to administer large grants effectively in multi-county regional implementations.
 - Second round of funding to high-capacity agencies serving counties not covered in the first round were considered.
 - Additional funding distributions are being planned to extend coverage for priority interventions, including homelessness prevention
- State HOPWA (DCA) distributed HOPWA CARES Act funding to current HOPWA sub-recipients.
- Additional DCA staff hired to administer CARES Act funds and support programs.
- HUD issued waivers and exceptions to make it easier to rapidly distribute and utilize ESG and CoC funds.



CARES Act Staffing

New Staff Positions

ESG-CV Program Specialist – Esau Williams

Landlord Engagement Specialist – Adam Graham

Community Liaison – Arlena Williams

Landlord Engagement Specialist – Omari Mayberry

ESG-CV Program Consultant – Constance Smith

Grants Consultant-CARES – Elizabeth Bogue

ESG-CV Program Consultant – Shavonna McCalep

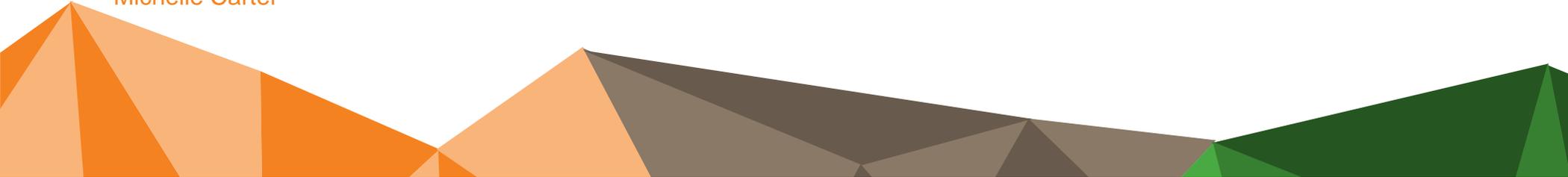
Grants Consultant-CARES – Courtney Buntyn

ESG-CV Program Consultant – Jasma Smith

ESG-CV Data Specialist – Cassandra Hobbs

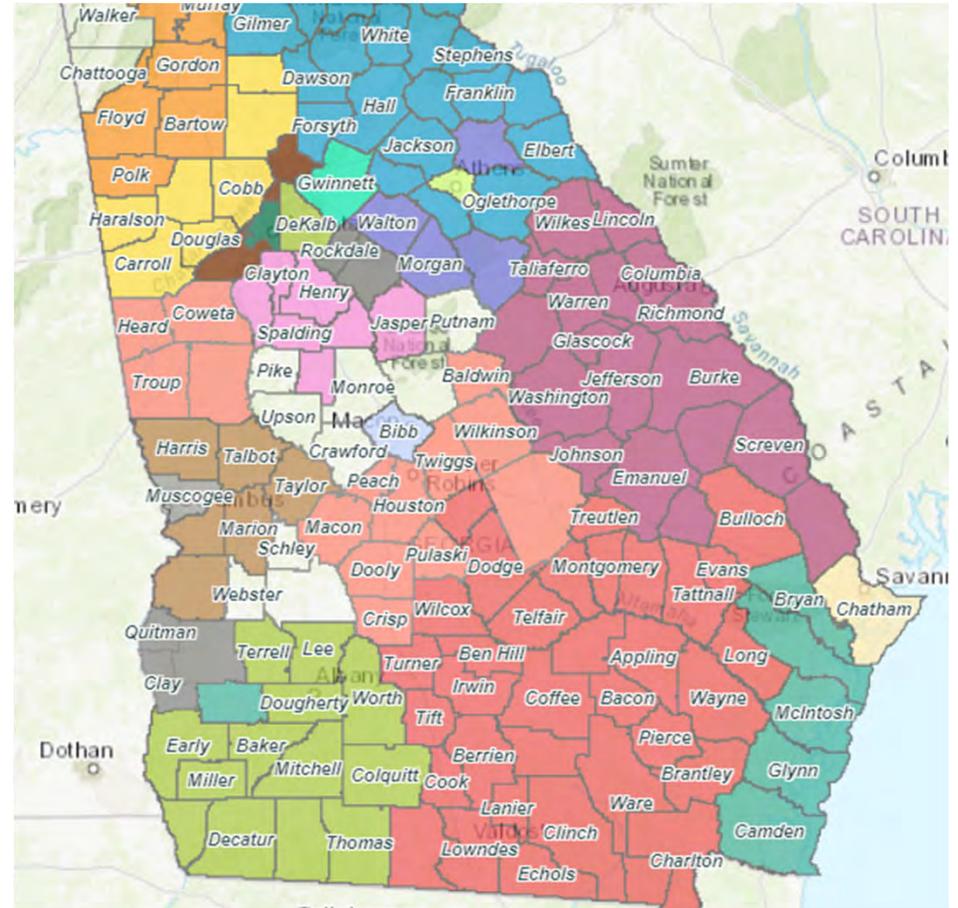
Special Needs Housing Program Coordinator –
Michelle Carter

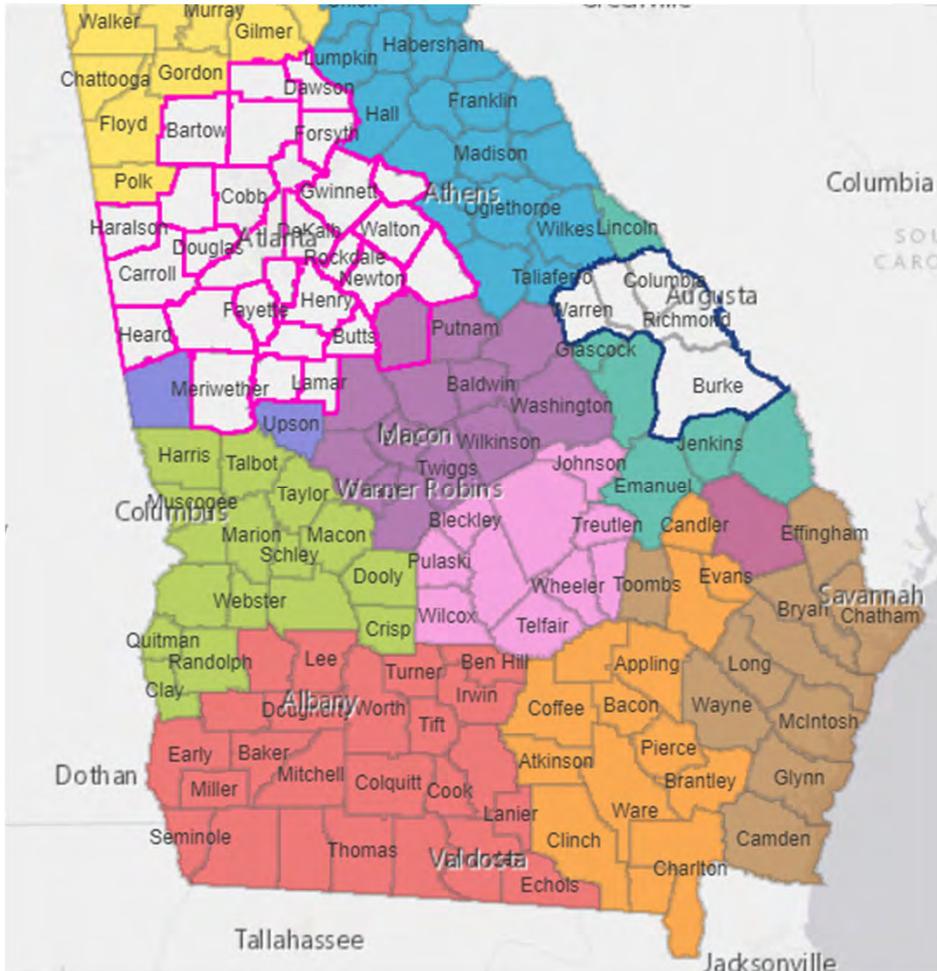
CARES HOPWA Program Consultant – Ayana Eady



CARES Act ESG Resources

- <https://georgia-dca.maps.arcgis.com/apps/webappviewer/index.html?id=1d28c562b3ba4390a66640db23f713fe>





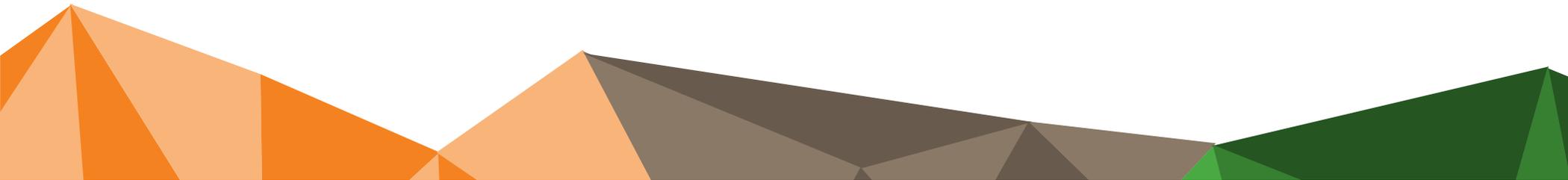
HOPWA Resources

- <https://georgia-dca.maps.arcgis.com/apps/webappviewer/index.html?id=28e98c7dea484a45ac5f836207e020ee>

BoS Written Standards Update & COVID-19 Response Addendum

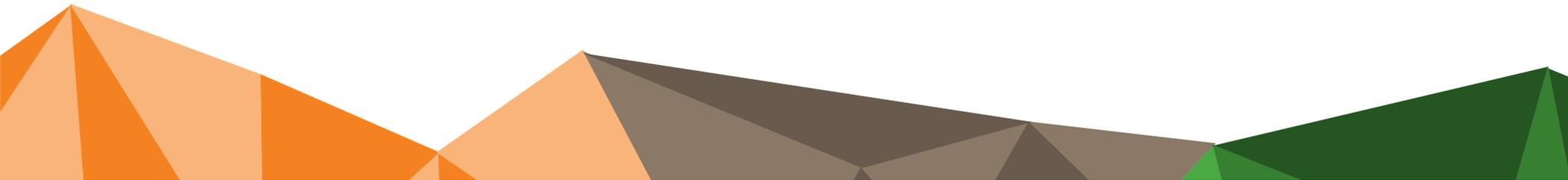
BoS Written Standards Updates

- Approved updates include:
 - Updated language for requirement to follow eligibility guidance in the NOFA;
 - Updated language for RRH rent calculation to include allowances for utilities to align with regulations;
 - Updates to NOFA references of the definition of DedicatedPLUS projects (CoC-funded PSH); and
 - Addition of language for establishment of emergency protocols (and Addendum) in response to a state emergency, public health crisis, or other extenuating circumstances.



BoS Written Standards Addendum

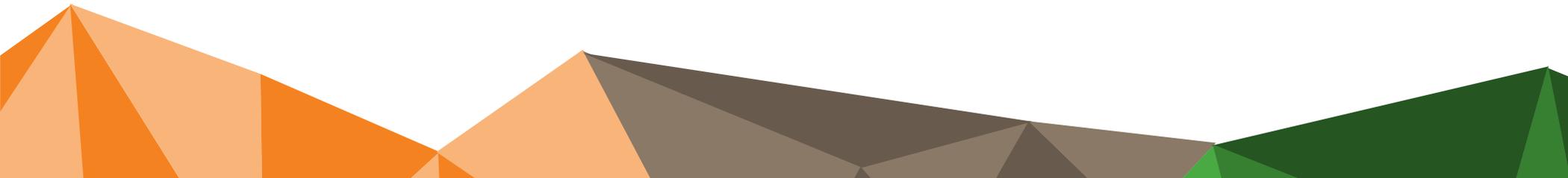
- Addendum issues new guidance and modifies existing policies and procedures for BoS projects for the duration of the COVID-19 pandemic.
- Addendum
 - CoC Recommendations
 - Requirement to follow interim guidance related to Coordinated Entry in response to COVID-19



Coordinated Entry Written Standards Update & COVID-19 Response Addendum

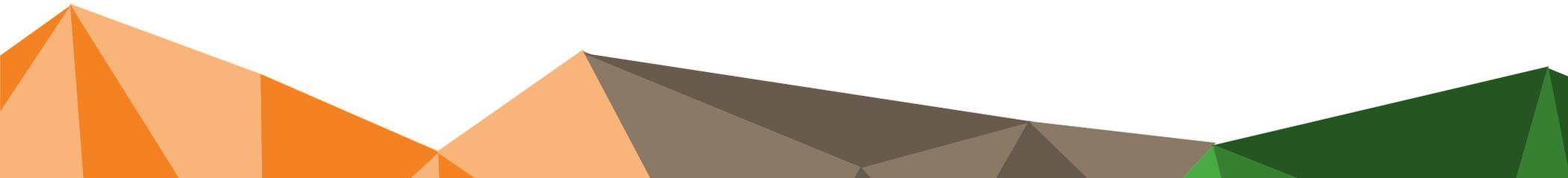
Coordinated Entry Written Standards, Policies, and Procedures Updates

- Approved updates include:
 - Addition of language for establishment of emergency protocols (and Addendum) in response to a state emergency, public health crisis, or other extenuating circumstances
 - Addition of language establishing that only substantial changes move to the Board for approval
 - Updates to language throughout to clarify assessment scores act as recommended interventions and are meant to inform process/match and not act as eligibility criteria
 - Addition of prioritization standards for Homelessness Prevention
 - Clarification of language around appeal process
 - Housing Match and Prioritization Process modified with the addition of the requirement for Case Conferencing



Coordinated Entry Written Standards Addendum

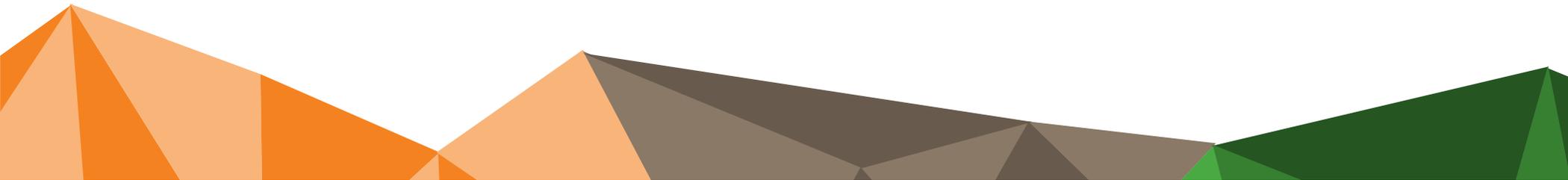
- Addendum modifies CoC Coordinated Entry Written Standards, Policies and Procedures and issues new guidance in response to COVID-19. Changes to Coordinated Entry Process and Prioritization per HUD guidance
- Addendum
 - Changes to prioritization standards
 - Establishes Priority Factors based on CDC recommendations
 - Additional CoC Recommendations include symptom screening and data sharing



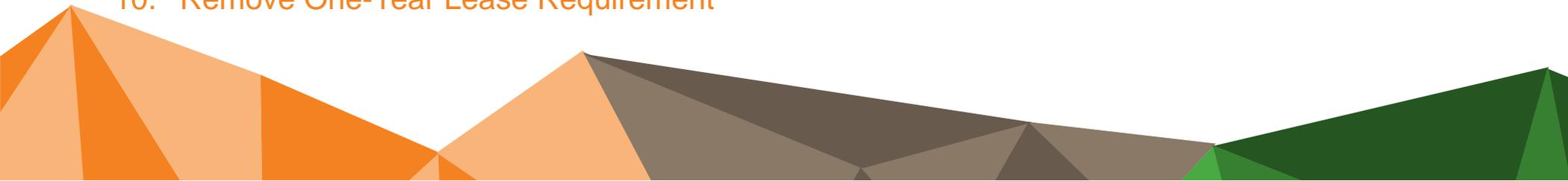
Availability of Additional Waivers for HUD CPD Programs – COVID-19

Availability of Additional Waivers for CoC Program Requirements (9/30/20)

- September 30, 2020 Memo outlining availability of waivers (CoC, YHDP, & ESG): <https://www.hud.gov/sites/dfiles/CPD/documents/CPD-COVID-19-Waiver-3-Final-Clean.pdf> (set to expire 12/31/20)
- Intended to prevent spread of COVID-19 and facilitate assistance to eligible communities and households economically impacted by COVID-19
- To use the waivers, recipients **must provide notification** in writing to CPD Director of Local HUD Field Office (CPD_COVID-19WaiverATL@HUD.gov) **two days before the recipient plans to use the waiver**. (No action required for #6)

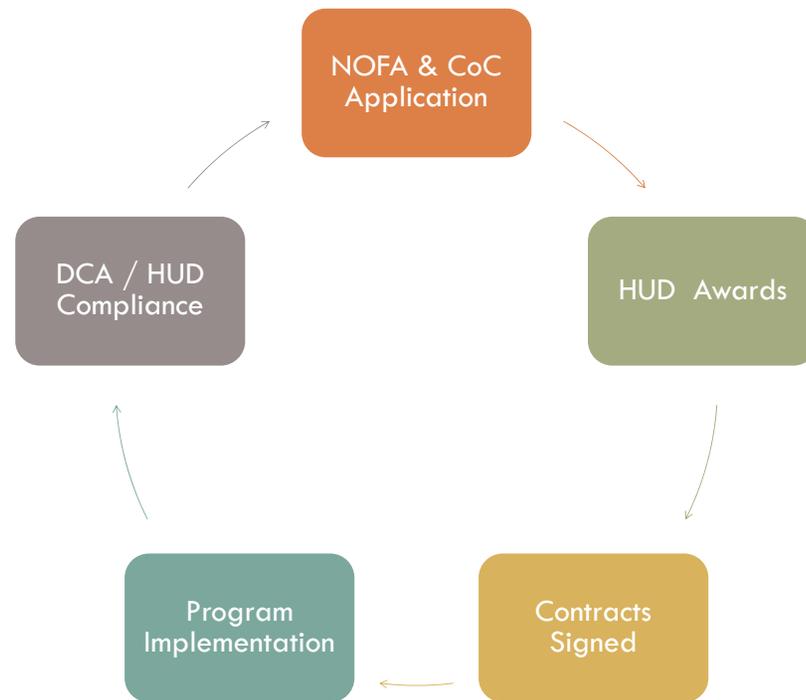


Waivers: Continuum of Care Program

1. Third-Party Documentation of Income
 2. Housing Quality Standards (HQS) –Suspend Initial Physical Inspection of Unit and Annual Re-Inspection
 3. Suitable Dwelling Size and Housing Quality Standards
 4. CoC Program Only: Coordinated Entry – Annual Ongoing Planning and Stakeholder Consultation
 5. Homeless Definition – Temporary Stays in Institutions of 90 days or less
 6. Assistance Available at Time of Renewal
 7. Remove Permanent Housing-Rapid Re-Housing Monthly Case Management requirement
 8. Fair Market Rent for Individual Units and Leasing Costs (unit must meet rent reasonableness)
 9. Disability Documentation for Permanent Supportive Housing (PSH)-Client self certification or staff observation may certify disability
 10. Remove One-Year Lease Requirement
- 

2019 Balance of State CoC Competition Debriefing

CoC Award and Implementation Cycle



Continuum of Care Program

Critical to KNOW the Regs!

- <https://www.hudexchange.info/coc/coc-program-law-regulations-and-notices/>
- <https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/>

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
24 CFR Part 578 [Docket No. FR-5476-I-01] RIN 2506-AC29
Homeless Emergency Assistance and Rapid Transition to Housing:
Continuum of Care Program

AGENCY: Office of the Assistant Secretary for Community Planning and Development.

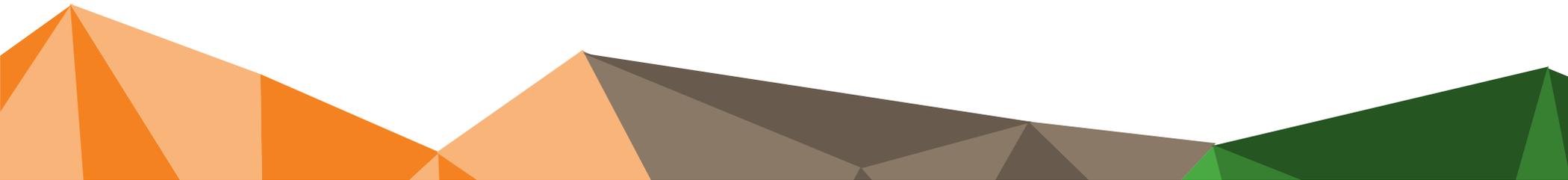
ACTION: Interim rule.

PART 578 — CONTINUUM OF CARE PROGRAM

	Introductory Sections	Commenting Instructions	
		Executive Summary	
		Background / Summary	
	Subpart A – General Provisions		Regulation
578.1	Purpose and scope.	Preamble	Regulation
578.3	Definitions.	Preamble	Regulation
	Subpart B – Establishing and Operating a Continuum of Care	Preamble	Regulation

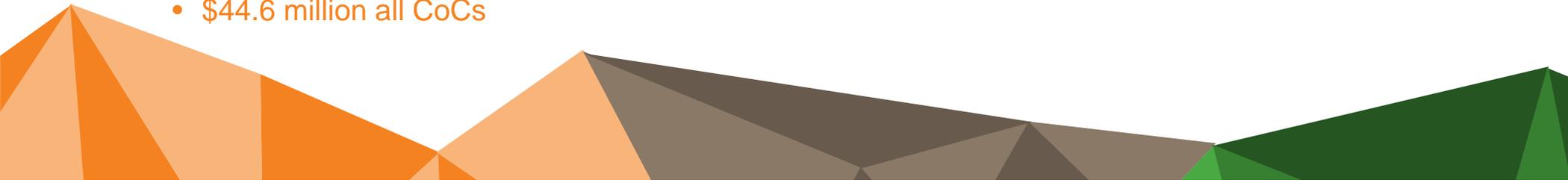
2019 BoS CoC Competition Results

- \$18.5 million awarded to 68 Renewal projects AND \$336,924 awarded to 2 New projects
- All projects in Tier 1 funded
- Funded Renewal projects
 - 50 renewal PSH
 - 15 renewal RRH
 - 1 new RRH
 - 2 renewal HMIS
 - 1 renewal Coordinated Entry
 - 1 new Coordinated Entry



2019 BoS CoC Competition Results (cont'd.)

- Tier 2 Projects Funded (2.5 projects)
 - Tier 2 portion (\$207,242) of Renewal RRH project straddled between Tiers 1 & 2
 - New \$200,000 Coordinated Entry grant (reallocated funds for 10 CES anchor sites)
 - New \$136,924 RRH project for Youth (reallocated \$)
- Other NEW projects
 - CoC Planning (funded outside of ARD allowed)
- Funding points:
 - FMR/Other adjustments were \$672,642 over request
 - Around \$250,000 more than previous year
 - Nationwide less funding for Tier 2 in 2019 (\$82 million under 2018)
- Total awards (Tier 1 and Tier 2)
 - \$19.4 million Balance of State CoC
 - \$44.6 million all CoCs



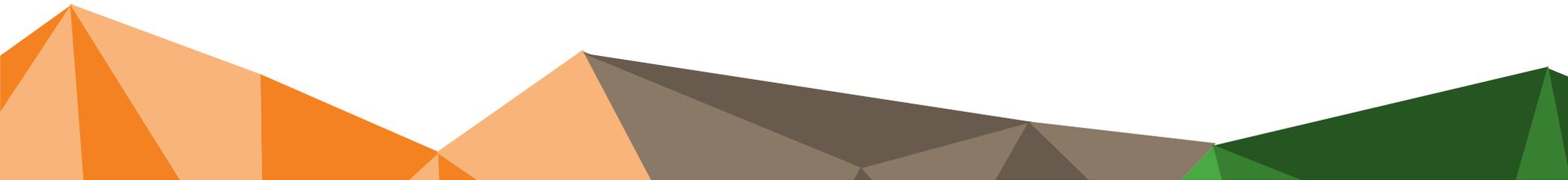
2019 Renewal Project Performance (project scores)

• Project Scoring Issues & Concerns

- Previous residence indicating literal homelessness –
 - 14 100% & 13 95% or more & 19 <95% PSH (of 46)
 - 5 100% & 4 95% or more & 4 <95% RRH (of 13)
 - Spending all grant funds (19 of 59 <90%)
 - Housing Stability/Exits to PH (74% avg for 4 projects)
 - Returns to homelessness (goal was 15% or less)
 - Leavers with Mainstream Benefits
 - Increased Income
 - Timeliness Data Entry
 - Coordinated Entry Participation (16 not meeting requirements)
 - Leveraging (26 less than 125% with 2 less than 15%)
- 

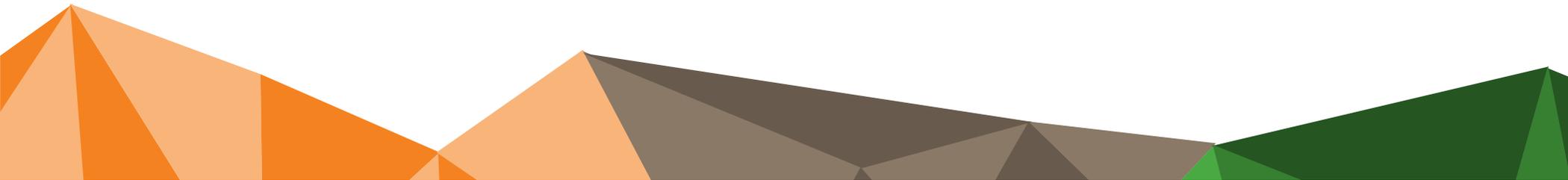
2019 Renewal Project Performance (project scores cont'd.)

- **Project Scoring Good Areas**
 - Quarterly drawdowns from LOCCS
 - Project/Unit Utilization
 - Housing Stability/Exits to PH (54 of 59 projects)
 - Returns to homelessness (most met goal)
 - Data Quality (improvement)



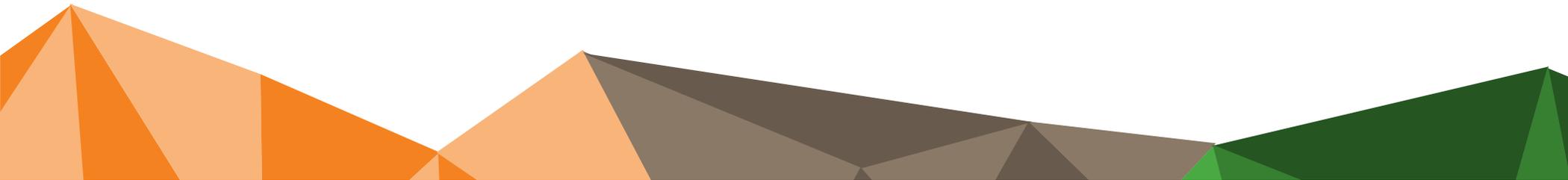
Reminder: BoS CoC Coordinated Entry Participation

- All projects must participate in coordinated entry, and selection of program participants must be consistent with the CoC's Coordinated Entry process
- BoS CoC-funded projects required to coordinate locally to serve people experiencing homelessness IN the Balance of State CoC
- 2019 BoS CoC Coordinated Entry Policy Addendum (Certification)
- Critical for applicants with projects funded to address homelessness in the Balance of State CoC to target, providing outreach, and participate in local coordinated entry implementation areas (as applicable) in order to reduce homelessness in the Balance of State CoC



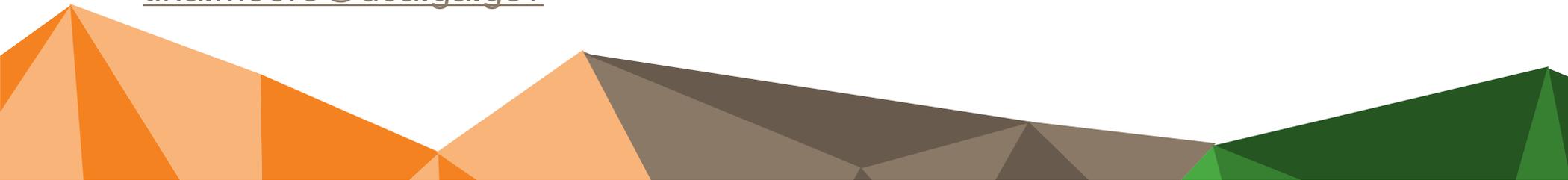
Reminder: BoS CoC Coordinated Entry Participation (cont'd.)

- Critical for applicants in non-implementation areas to target, provide outreach, and participate in CES planning to reduce homelessness in the Balance of State CoC
- If being assessed by a DV specific agency, participant information will not be entered into HMIS. De-identified information (DV comparable database client key, VI-SPDAT score, family size, veteran status, and chronicity) will be added to the supplemental prioritization list. Lead agency will follow the standard assessment, prioritization and referral process.
- **Information and training:** <https://www.dca.ga.gov/safe-affordable-housing/homeless-special-needs-housing/georgia-balance-state-continuum-care/balance>



Reminder: Environmental Reviews – BoS CoC-funded Projects (direct grantees)

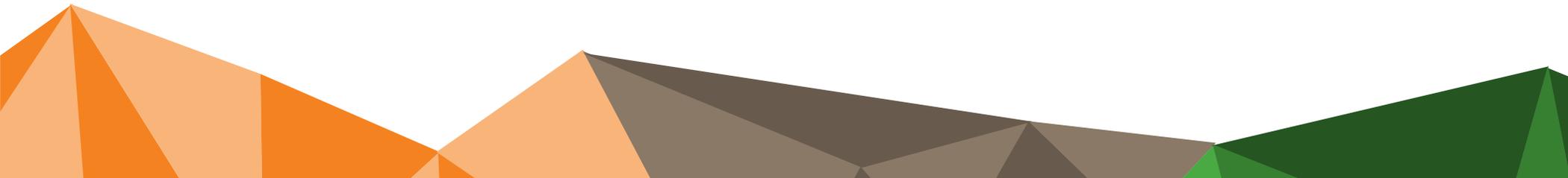
- All CoC Program projects **required** to have an Environmental Review (ER). Direct grant recipients (f/k/a SHP) should submit completed ER form to DCA for the following BoS CoC-funded projects:
 - Rapid Re-Housing (RRH Form)
 - Permanent Supportive Housing (PSH Form)
- Environmental Review forms for PSH and RRH projects funded under the Balance of State CoC can be found on the following web page:
<https://www.dca.ga.gov/node/4042>.
- Email completed forms to: Rick.Heermans@dca.ga.gov (please cc tina.moore@dca.ga.gov)



2020 Balance of State CoC Competition Status Update

2020 BoS CoC Competition Status Update

- 2020 Continuum of Care Competition Update
 - HUD is currently exploring alternative approaches to distributing funds
 - Pending legislation could allow automatic renewals
 - Absent Legislation, HUD will run full competition
 - Once HUD opens competition/releases more details, we may need to call a special meeting of the CoC Board before information available
 - Grant Inventory Worksheet
 - Submitted draft changes to HUD for review August 19th
 - Determines eligible projects, project renewal amounts, and total BoS CoC Annual Renewal Amount (ARA)
 - ARA currently estimated to be over \$18.8 million

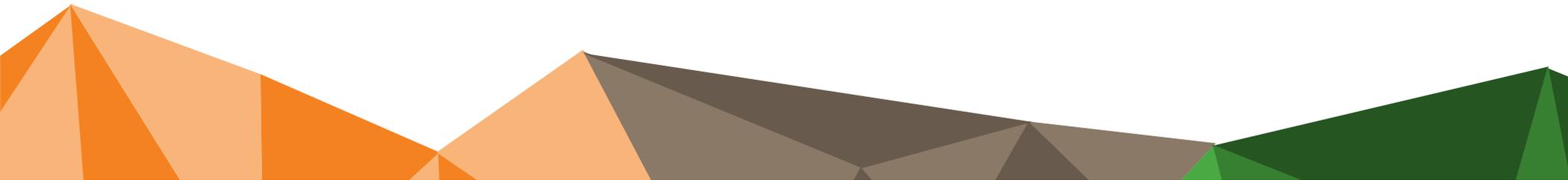


Balance of State CoC Performance

Balance of State CoC Performance Plan

The Performance Plan identifies project and system performance goals for the CoC and outlines how performance is measured and monitored. The plan should help homeless assistance projects in managing their performance and ensure access to ongoing funding.

- Data Quality
- Increase awareness and understanding of System Performance Measures
- System and Project Performance
- Sets performance objectives
- A plan for monitoring progress
- Goals updated annually
- Focused training and TA opportunities to provide tools and knowledge needed to improve

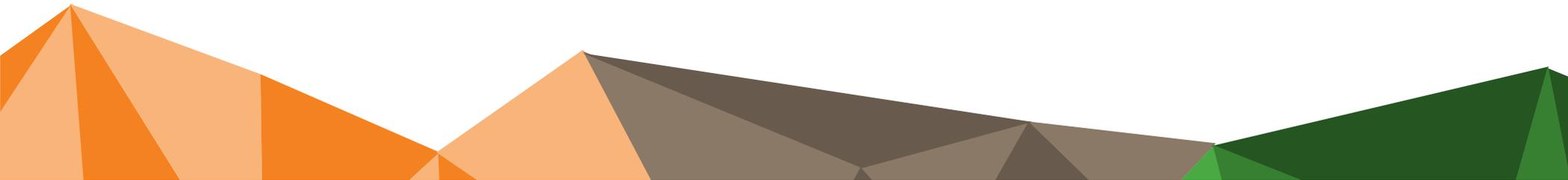


BoS CoC Updates

Balance of State CoC Updates

- Staff Updates

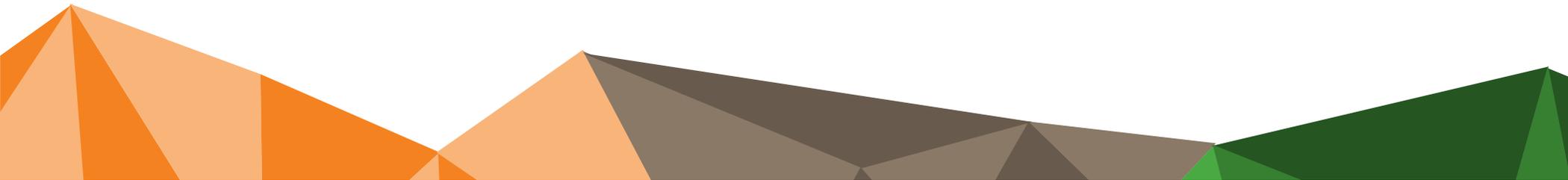
- Cynthia Patterson promoted to Director, Office of Homeless & Special Needs Housing
- David Whisnant promoted to Director, Division of Housing Assistance
- Rebecca Hickom promoted to new position, Continuum of Care Performance Coordinator
- Amanda Brand hired as Coordinated Entry System Coordinator
- Chandra Woods and Rhonda Taylor, HMIS Data Analysts, moved to HMIS Lead team



Balance of State CoC Updates (cont'd.)

- Public Housing Authority Collaboration

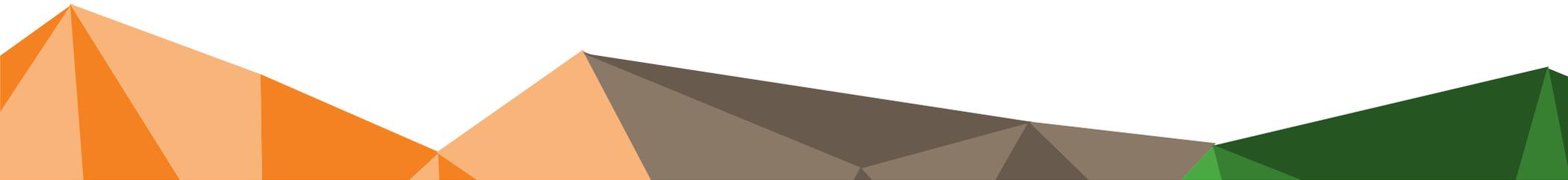
- Continuum of Care preference vouchers are available through the Georgia Housing and Finance Authority Housing Choice Voucher program
- Preference vouchers are currently targeted towards prevention/diversion candidate households with low service needs presenting to Balance of State CoC Coordinated Entry lead sites
- Future preference vouchers may also be targeted towards households receiving rapid rehousing or prevention services in the Balance of State CoC



2021 BoS Homeless Count

2021 CoC Homeless Count Update

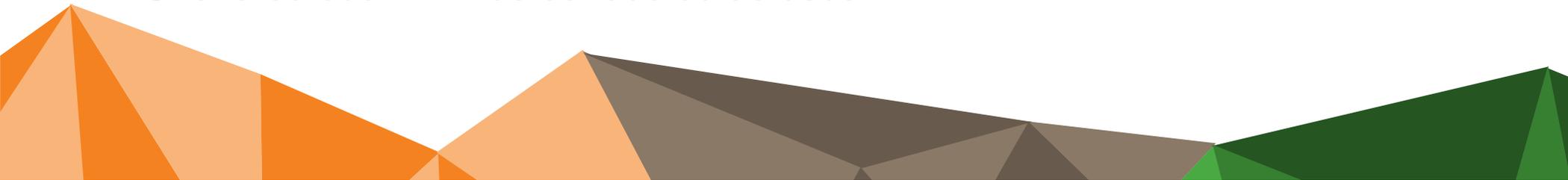
- January 25, 2021 has been chosen as the night of the count
- Additional information on the sheltered and unsheltered count will be distributed to BoS CoC mailing lists
- Unsheltered count leads have been identified for approximately 30 counties
- Count training was conducted on December 16th, with further training planned for January
- Significant changes to the unsheltered portion of the count are expected due to COVID-19



2021 CoC Homeless Count Update (cont'd.)

Despite COVID-19, the count will be like previous years in many ways:

- There will still be sheltered and unsheltered components
- Counting Us app from Simtech Solutions will be utilized
- Unsheltered counts will be organized by local leads
- Predictive modeling will be used for areas not canvassed
- Sheltered count will be conducted as usual



2021 Housing Inventory & Sheltered Homeless Count Overview

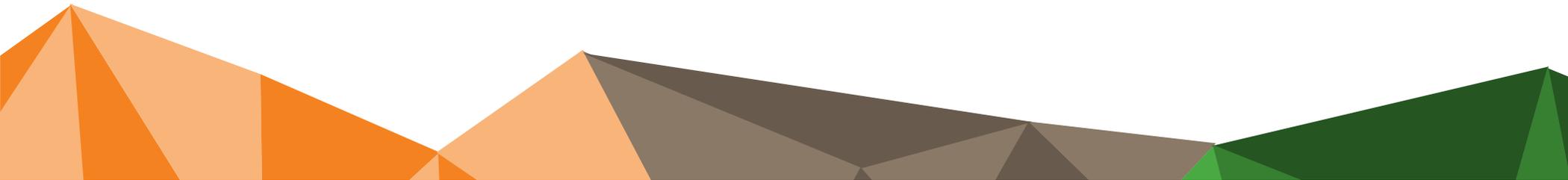
- ❑ Similar to 2020, the Balance of State CoC will conduct the 2021 Housing Inventory and Sheltered Homeless Point In Time count by distributing a provider-level survey to all Homeless Assistance agencies (funded and non-funded/ HMIS-participating and Non-HMIS participating) within the Balance of State 152-county jurisdiction.
- ❑ Survey data collected will be regarding Housing bed inventory and homeless count of the night of the count, Monday, January 25.
- ❑ Survey Submission Deadline: Tuesday, February 2.
- ❑ Completed surveys are submitted via a link
 - ❑ No paper surveys should be collected this year
- ❑ Results will establish the housing capacity of the Balance of State CoC and count of sheltered persons on the night of the count.

2021 Unsheltered Homeless Count Overview

- ❑ The PIT count window begins the night of January 25, 2021 and goes through February 7, 2021
- ❑ Similar to our unsheltered PIT counts in the past, housing screening surveys administered at service locations and other places where homeless people congregate or live
- ❑ Surveys can be collected during the night of the count (a night count is not required), and should also be collected for up to 14 days in order to ensure that all those who are experiencing homelessness in the coverage area are surveyed (this is required)
 - ❑ Street outreach efforts are encouraged when possible and safe
- ❑ Completed surveys are submitted via the Counting Us app
 - ❑ No paper surveys should be collected this year
- ❑ Results will establish the number of persons experiencing homelessness in each county covered

Summary of Changes to the 2021 Unsheltered Count Due to COVID-19

- Survey will be brief (3 to 5 questions) and only collect enough information to deduplicate
- Street counts are optional and may be conducted anytime during the 14-day count window, asking where the person was on the night of January 25th
- Existing street outreach teams should conduct street counts whenever possible
- Service based counting approaches should be emphasized
- Volunteers in high-risk categories for COVID-19, as defined by the CDC, SHOULD NOT participate in count activities
- Funding provided by DCA may be used to purchase PPE
- Work with local public health authorities and follow ALL CDC safety guidance



2021 BoS Homeless Count Q & A

Public Comment

Balance of State Staff Contacts

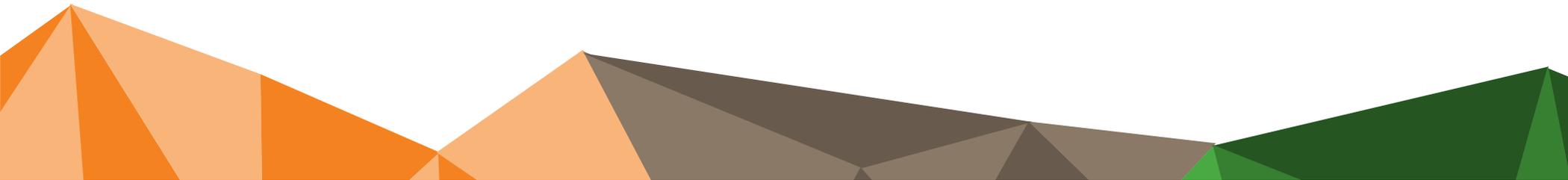
- Questions?
 - Cynthia Patterson, Director
(404) 679-0630 / cynthia.patterson@dca.ga.gov
 - Mike Thomas, CoC Program Manager
(404) 679-0571 / Michael.Thomas@dca.ga.gov
 - Tina Moore, CoC Program Coordinator
(404) 327-6870 / tina.moore@dca.ga.gov
 - April Woods, CoC Program Coordinator
(404) 679-0651 / April.Woods@dca.ga.gov
 - Rebecca Hickom, Continuum of Care Performance Coordinator
(470) 423-1432 / rebecca.hickom@dca.ga.gov
 - Isaac Davis, Coordinated Entry System Coordinator
(404) 370-2985 / isaac.davis@dca.ga.gov
 - Amanda Brand, Coordinated Entry System Coordinator
(470) 328-9686 / amanda.brand@dca.ga.gov
 - Chandra Woods McGhee, HMIS Data Analyst
(404) 649-0655 / BoSHMIS@dca.ga.gov
 - Ambra Houser, Data Analyst
(404) 679-3102 / ambra.noble@dca.ga.gov
 - Rhonda Taylor, HMIS Data Analyst
(404) 679-0634 / BoSHMIS@dca.ga.gov



Thank You!

Any questions?

You can contact DCA at: Tina.Moore@dca.ga.gov or Michael.Thomas@dca.ga.gov

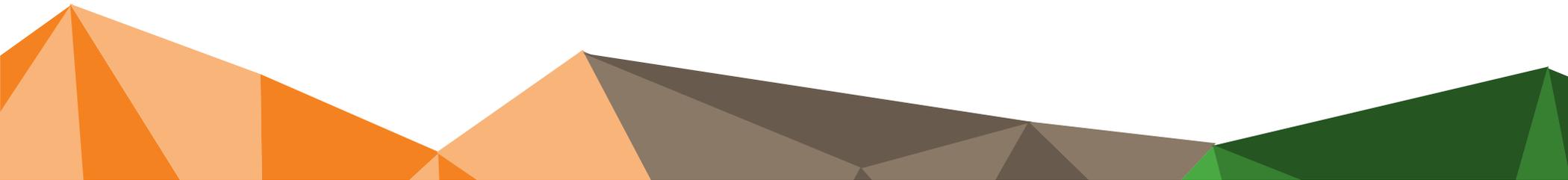


Details: Waivers for HUD CPD Programs – COVID-19

Waivers: CoC Program (cont'd.)

1. Third-Party Documentation of Income

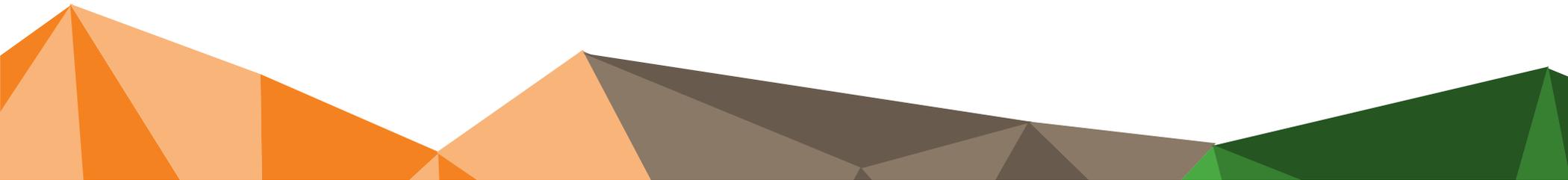
- Waiver of requirement that recipient or subrecipient may only rely on program self-certification of income if the other permitted types of documentation are unobtainable when conducting initial or subsequent rent or occupancy charge calculations.
- This waiver is in effect Sept. 30, 2020 until December 31, 2020



Waivers: CoC Program (cont'd.)

2. Housing Quality Standards (HQS) –Suspend Initial Physical Inspection of Unit and Annual Re-Inspection

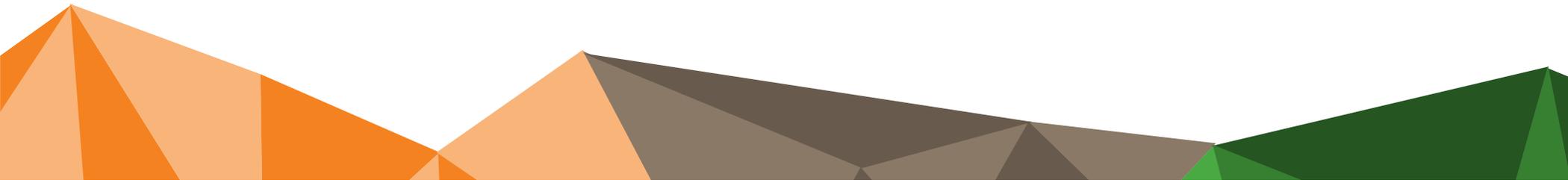
- Waiver of requirement that each unit is physically inspected for HQS before providing assistance is in effect beginning the date of the memo (September 30, 2020) until December 31, 2020, for recipients and subrecipients that are able to meet the following criteria:
 - Owner certifies that they have no reasonable basis to have knowledge that life-threatening conditions exist in the unit or units in question; AND
 - Recipient/subrecipient has written policies to physically re-inspect unit within 3 months after health officials determine no additional measures are necessary to prevent spread of COVID-19



Waivers: CoC Program (cont'd.)

3. Suitable Dwelling Size and Housing Quality Standards

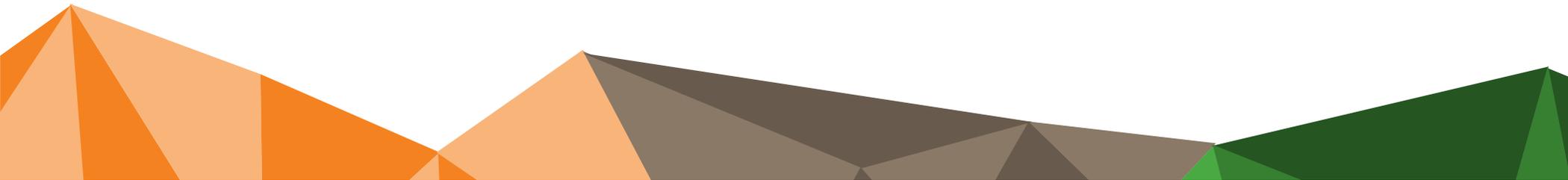
- Waiver of requirement that at least one bedroom or living/sleeping room for each two persons for Permanent Housing-Rapid Re-Housing assistance for leases and occupancy agreements executed between September 30, 2020 and December 31, 2020, and extending only until the later of:
 - The end of the initial term of the lease or occupancy agreement; OR
 - December 31, 2020



Waivers: CoC Program (cont'd.)

4. CoC Program Only: Coordinated Entry – Annual Ongoing Planning and Stakeholder Consultation

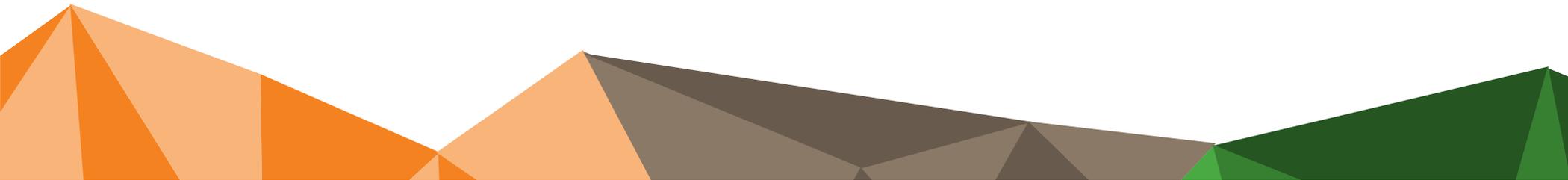
- To extent necessary, the requirement in Section II.B.15 of the Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System is waived for 1 year beginning September 30, 2020.



Waivers: CoC Program (cont'd.)

5. Homeless Definition – Temporary Stays in Institutions of 90 Days or Less (expanded to 120 days or less)

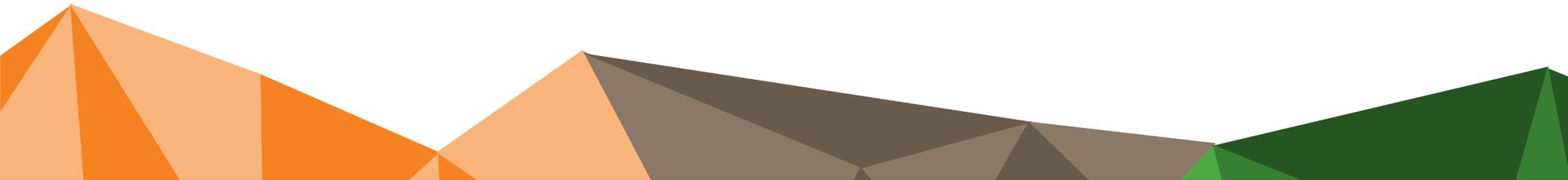
- An individual may qualify as homeless so long as he or she is exiting and institution where they resided for 120 days or less and resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
- Waiver in effect for 6-months beginning September 30, 2020.
- Does NOT expand definition of chronic homelessness.



Waivers: CoC Program (cont'd.)

6. Assistance Available at Time of Renewal

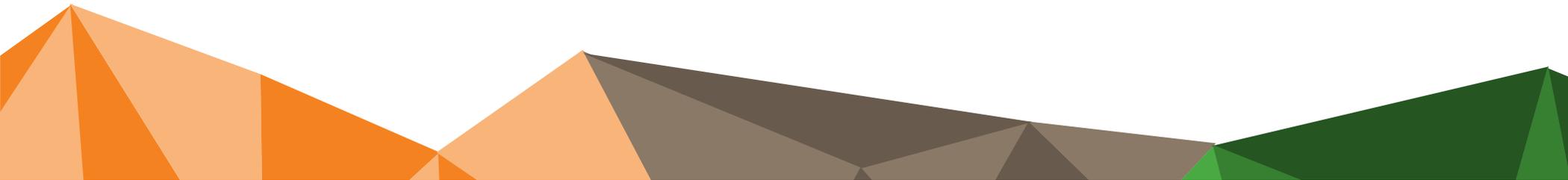
- Requirement that renewal grant amount be based on budget line items (BLM) in final year of grant being renewed is waived for projects that amend grant agreement between October 1, 2020 and December 31, 2020 to move funds between line items in response to COVID-19.
- Recipients may then apply in the next FY CoC Program funding cycle based on the grant's BLMs before they were amended.
- Action NOT required for #6 as HUD will consider any grant agreement amendment executed between March 31, 2020 and December 31, 2020, to move funds between BLMs, as notification.



Waivers: CoC Program (cont'd.)

7. Remove Permanent Housing-Rapid Rehousing Monthly Case Management requirement

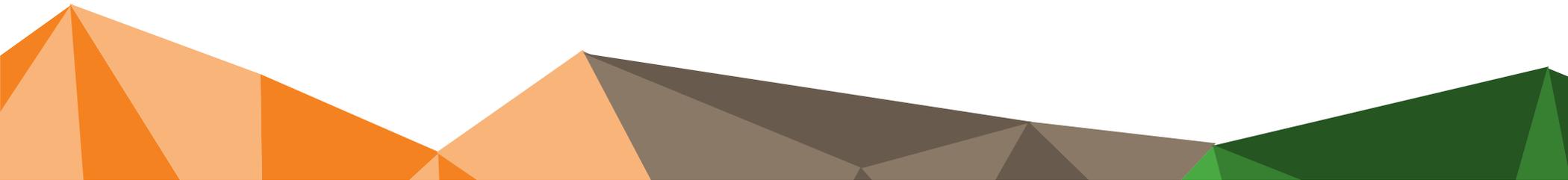
- Requirement that projects require program participants to meet with case managers not less than once per month would be waived for all permanent housing-rapid re-housing projects
- This waiver is in effect from the date of this memo (September 30, 2020) until December 31, 2020.



Waivers: CoC Program (cont'd.)

8. Fair Market Rent restriction for Rental Units and Leasing Costs (unit must meet rent reasonableness)

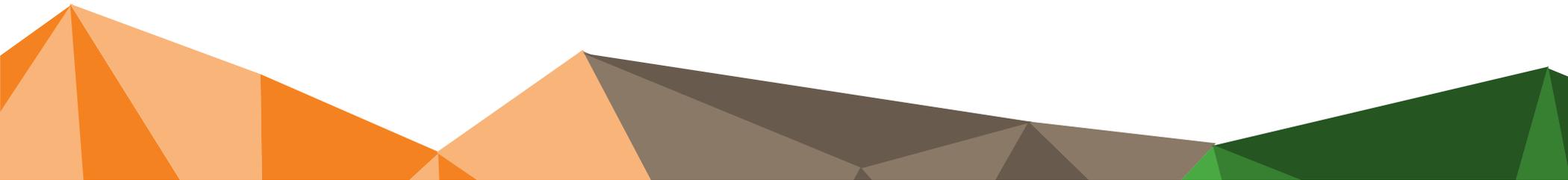
- FMR restriction would be waived for any lease executed by recipient or subrecipient to provide permanent supportive housing (PSH) during the 6-month period from September 30, 2020 through December 31, 2020.
- Rent paid for units leased with leasing dollars must meet reasonableness standards



Waivers: CoC Program (cont'd.)

9. Disability Documentation for Permanent Supportive Housing (PSH)- Client self certification or staff observation may certify disability

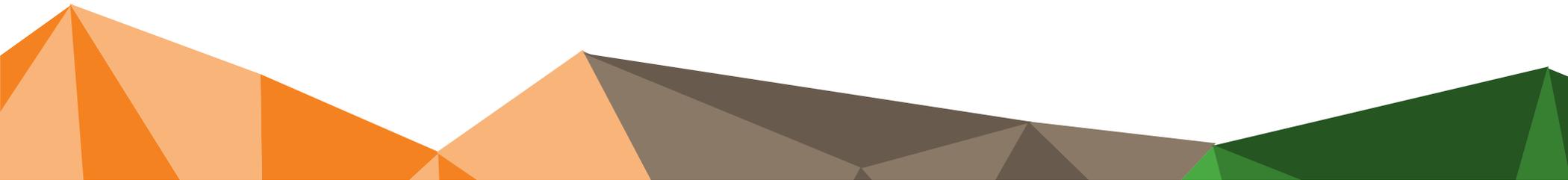
- Requirement that intake staff-recorded observation of disability be confirmed and accompanied by other evidence no later than 45 days from application for assistance documentation requirement is waived for participants admitted into CoC-funded PSH until public health officials determine no additional measures are necessary.
- Written certification by individual seeking assistance is considered acceptable documentation until that time.



Waivers: CoC Program (cont'd.)

10. Remove One-Year Lease Requirement

- One-year lease requirement would be waived leases executed between September 30, 2020 and December 31, 2020, so long as the initial lease term of all leases is at least one month.



Waivers: Attachment #1 to Memorandum (page 12 of memo)

- Procedure for using available waivers to include:
 - Process grantees must follow
 - Must mail or email notification to Atlanta HUD field office
 - Must be sent two days before grantee anticipates using waiver flexibility, and include (except #6):
 - Requestor's name, title, and contact information;
 - Date on which the grantee anticipates first use of the waiver flexibility; and
 - A list of the waiver flexibilities the grantee will use.

