The Way Home Continuum of Care has received various awards of Coronavirus Aid, Relief and Economic Security (CARES) Act Emergency Solutions Grants (ESG). This funding is used to prevent, prepare for and respond to COVID-19.

To ensure The Continuum of Care operates these funds in the best response and preparation for COVID-19, this addendum applies to all CARES ESG Funding awarded and executed in our community.

**Effective Date:**

This addendum goes into effect in accordance with HUD Waivers – March 31, 2020

**HUD Regulatory Waivers:**

- As a result of the COVID-19 pandemic, HUD expanded eligible uses of HMIS. HUD waived 24 CFR §576.107(a)(2) which authorizes use of ESG funds for managing and operating the Homeless Management Information System (“HMIS”) funds if the recipient is the HMIS lead agency. This waiver allows Subrecipient to use ESG funding for the provisions in 24 CFR §576.107(a)(2) even if the Subrecipient is not an HMIS lead agency. Expanding HMIS eligible activities allows more Subrecipient to use ESG funding to upgrade or enhance the HMIS as needed to incorporate ESG program data related to COVID-19. The waiver to expand HMIS eligible activities will be in effect from April 5, 2020, to September 30, 2020.

- As a result of the COVID-19 pandemic, HUD changed re-evaluations from three to six months for homelessness prevention. HUD waived 24 CFR §576.401(b) which requires a re-evaluation of the Program Participant’s eligibility and the types/amounts of assistance to occur not less than once every three months. With the waiver, re-evaluations for homelessness prevention will be required not less than once every six months. Waiving three-month re-evaluation requirement for homelessness prevention assistance is necessary to help program participants remain stable in housing during the economic uncertainty caused by COVID-19. This waiver applies from April 5, 2020, to March 31, 2022.

- As a result of the COVID-19 pandemic, HUD suspended monthly case management. HUD waived 24 CFR §567.401(e), which requires Program Participants to meet with a case manager not less than once per month, unless the Violence Against Women Act of 1994 or Family Violence Prevention and Services Act prohibits the shelter or housing being conditional on the Program Participant’s acceptance of services. Waiving the monthly case management requirement until September will allow ESG Subrecipient to provide case management on an as-needed basis and reduce the possible spread and harm of COVID-19. This waiver is in effect from April 5, 2020, to August 22, 2020.

- As a result of the COVID-19 pandemic, HUD waived the Fair Market Rent (FMR) requirement. HUD waived 24 CFR §576.106(d)(1), which requires total gross rent to be equal or less than the FMR established by HUD. Moving people into permanent housing is especially critical to prevent the spread of COVID-19, and this waiver will assist providers to more quickly locate additional units to house persons experiencing homelessness. The rent reasonableness standard still applies. The FMR requirement is waived from April 5, 2020, to September 30, 2020.
Extension of Waivers:

- If as a result of the COVID-19 pandemic, HUD or the Department extends the time period for the above mentioned HUD Regulatory waivers or Department Waivers, and there are no substantive changes associated with said extension, the Department may allow use of the waivers for the extended time period without the requirement of a written amendment hereto. In such an event, however, Subrecipient should retain any written correspondence from the Department regarding said extension of the COVID-19 related waivers.

Homeless Prevention:

- Entitlement ESG is up to 30% AMI but ESG-CV is waived up to 50% AMI. However, The Way Home system will continue to use these funds is for those households falling under 30% AMI.
- Any ESG-CV recipients or subrecipients must coordinate with the CoC, including but not limited to Coordinated Access, HMIS participation, and CAPER reporting, and follow all ESG requirements that have not already been waived.
- Prioritize COVID homeless prevention to persons and households with actual COVID diagnosis and/or positive tests with resulting loss of income.

Rapid Rehousing:

- Any RRH awarded with COVID CARES funding would not operate under the CMI structure as identified in the RRH Business Rules, but in collaboration with The Way Home System.
- Any ESG-CV recipients or subrecipients must coordinate with the CoC, including but not limited to Coordinated Access, HMIS participation, and CAPER reporting, and follow all ESG requirements that have not already been waived. We may need to say something about using some of these funds as a bridge to PSH.
- Case management is needed especially during COVID-19 so we do not recommend waiving monthly meeting requirement listed in the ESG Written Standards. Allow monthly meetings to be conducted in the following priority:
  - Virtual monthly meetings, for example via zoom or other face time app.
  - Telephone meetings
- Prioritize Homeless Medical Isolation and Recovery Center (HMIRC) customers
  - It should be noted, rapid rehousing funds are directed to individuals and families with income or work history and skills that indicate employability.