



MEMORANDUM

TO: ESG HP RRH AGENCIES

**FROM: ALLEGHENY COUNTY ECONOMIC DEVELOPMENT
CITY OF PITTSBURGH, OFFICE OF MANAGEMENT AND BUDGET**

DATE: MAY 6, 2020

**SUBJECT: EMERGENCY SOLUTIONS GRANT PROGRAM
COVID-19 WAIVERS**

Due to COVID-19, the Housing and Urban Development (HUD) is allowing recipients of Emergency Solutions Grant (ESG) funds to request a waiver for certain regulatory requirements associated with the Emergency Solutions Grants (ESG) Program for the Homelessness Prevention and Rapid Re-Housing (HP RRH) component to provide flexibility to their sub-recipients to prevent the spread of COVID-19 and better assist individuals and families, including those experiencing homelessness or near homelessness during this crisis.

Allegheny County Economic Development (ACED) and the City of Pittsburgh sent a request to HUD to waive the following regulatory requirements of the ESG Program and our request for the HP RRH waivers have been approved by HUD for the 2018, 2019 and 2020 Program years as follows:

Re-evaluations for Homelessness Prevention Assistance

- HUD requires recipients or subrecipients providing homelessness prevention assistance to re-evaluate each program participant's eligibility, and the types and amounts of assistance program participant needs not less than once every 3 months. This waiver is necessary to help program participants remain stable in housing during the economic uncertainty caused by COVID-19. HUD is waiving the re-evaluation requirement for homelessness prevention assistance to not less than once every six (6) months. *This waiver is in effect for up to 2 years beginning April 1, 2020.*

Housing Stability Case Management

- HUD requires Program participants receiving homelessness prevention or rapid re-housing assistance must meet with a case manager not less than once per month, unless certain statutory prohibitions apply. The recipient or subrecipient must require program participants to meet with a case manager not less than once per month to assist them in ensuring long-term housing stability,

unless the Violence Against Women Act of 1994 or Family Violence Prevention and Services Act prohibits the recipient or subrecipient from making its shelter or housing conditional on the participant's acceptance of services. Since recipients are reporting limited staff capacity as staff members are home for a variety of reasons related to COVID-19 (e.g., quarantining, children home from school, working elsewhere in the community to manage the COVID-19 response). In addition, not all program participants have capacity to meet via phone or internet. HUD is waiving the monthly case management requirement to allow recipients or sub-recipients to provide case management on an as needed basis to reduce the possible spread and harm of COVID-19. ***This waiver is in effect for two months beginning on April 1, 2020.***

Restriction of Rental Assistance to Units with Rent at or Below FMR

- HUD requires restriction of rental assistance to units with rent at or below FMR. Rental assistance cannot be provided unless the total rent is equal to or less than the FMR established by HUD, as provided under 24 CFR Part 888, and complies with HUD's standard of rent reasonableness, as established under 24 CFR 982.507. Quickly moving people into permanent housing is especially critical in preventing the spread of COVID-19. Waiving the limit on rental assistance to rents that are equal to or less than the FMR, established by HUD, will assist recipients and subrecipients in more quickly locating additional units to house individuals and families experiencing homelessness.

HUD is waiving the FMR restriction for any individual or family receiving Rapid Re-housing or Homelessness Prevention assistance who executes a lease for a unit during the 6-month period beginning on April 1, 2020. The ESG recipient or subrecipient must still ensure that the units in which ESG assistance is provided to these individuals and families meet the rent reasonableness standard. ***This waiver is in effect during the 6-month period of executing a lease beginning on April 1, 2020.***

The above waivers will allow ESG subrecipients to assist affected program beneficiaries and program eligible households to prevent the spread of COVID-19 and to mitigate against the economic impact caused by COVID-19 for eligible households. Please note, there is no change to the inspection protocol for ESG, even though we know there is under CoC. All units must be inspected.

When using the waiver of normal ESG program requirements, documentation should be entered into the client file to show why the waiver is being used, and how the new requirements are being met. Please use the ESG COVID-19 Waiver Documentation Checklist for each instance the waiver is used.

ESG Lead Agencies that received State ESG funding for the ESG Rapid Re-Housing Program the above waivers and documentation requirements also apply. The only difference is the State ESG waivers effective date is April 8, 2020.