Usage of Waiver: RRH Limit to 24 Months of Rental Assistance

**CoC Program**

On May 22, 2020, the Department of Housing and Urban Development issued a memorandum regarding “Availability of Additional Waivers of Community Planning and Development (CPD) Grant Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19,” which was supplemented by a memo on December 30, 2021 and on June 15, 2022 The memoranda outlined waivers of CoC Program grant requirements available to all CoC grant recipients.

* Use of Waiver before March 31, 2022: [RECIPIENT NAME] notified the HUD San Francisco Regional Office of our intent to implement the RRH Limit to 24 Months of Rental Assistance waiver on [DATE].
* Requested Non-Expedited Regulatory Waiver after June 15, 2022: [RECIPIENT NAME] submitted a non-expedited waiver request for this regulatory requirement from the HUD San Francisco Regional Office identifying the grant number(s) the waiver would apply to with a good cause justification to implement the RRH Limit to 24 Months of Rental Assistance waiver on [DATE]. [RECIPIENT NAME] received approval from HUD by email on [DATE] ~~Use of~~
* Requested Expedited Regulatory Waiver after June 15, 2022: [RECIPIENT NAME] submitted an expedited regulatory waiver request to [SNAPSinfo@hud.gov](mailto:SNAPSinfo@hud.gov) on [DATE]. CPD replied on [DATE] that the request was received. [RECIPIENT NAME] received approval from HUD on [DATE].

|  |
| --- |
| **RRH Limit to 24 Months of Rental Assistance** |
| **The 24-month cap on rental assistance for RRH participants is waived** for participants who reach 24 months of rental assistance on or after the date of HUD’s initial memo (May 22, 2020) through March 31, 2022. Rental assistance can continue, so long as it is still necessary to the client’s housing stability, through March 31, 2022.  Starting on June 15, 2022, a waiver can be requested on the 24-month cap on rental assistance for RRH participants who will have reached their 24-months of rental assistance between June 15, 2022 and March 31, 2023 and who will not be able to afford their rent without additional rental assistance. |

# Instructions

This form documents the request of the RRH Limit to 24 Months of Rental Assistance waiver. The waiver may only be used when necessary to keep a client housed and/or ensure their long-term housing stability, in accordance with the CoC’s Quality Assurance Standards and [RECIPIENT/SUBRECIPIENT NAME]’s written policies. Complete this form and insert into the client file every time this waiver is requested:

1. Complete the “Documentation Checklist” section of this form to ensure that all necessary additional documentation is included in the client’s file, along with this completed form.
2. Complete the “Justification for Use of Waiver” section of this form.
3. Insert this form (and all documentation listed in the Documentation Checklist) in the client’s file.

# Documentation Checklist:

**Client name:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ **Date:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Date the Client Reached 24 Months of Rental Assistance:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

|  |  |
| --- | --- |
| **The following additional documentation is included in the client’s file:** | **Checklist** |
| Documentation of 24 months of rental assistance payments, with the payment for the 24th month between May 22, 2020 and March 31, 2022. |  |
| Documentation, covering each month of rental assistance, of how the client’s portion of rent was determined, in compliance with the CoC’s Quality Assurance Standards and the program’s own policies and procedures. |  |

# Good Cause Justification for Use of Waiver

Explain why it was necessary for the program to provide rental assistance beyond 24 months, in order to keep the client housed or to ensure the client’s long-term housing stability. The explanation must be specific to this client’s situation and the local conditions at this time (for example, the impact of COVID-19 on the job market, the client’s employment, or the client’s ability to perform a job search or begin employment). The good cause justification must include: why the recipient needs the waiver, the impact on the recipients ability to help people experiencing homelessness to obtain or maintain housing if the waiver is not provided, and the proposed waiver duration. The explanation must be related to HUD’s reasons for expediting the waiver request which include preventing the spread of COVID-19 and facilitate assistance to communities and households economically impacted by the pandemic.

|  |  |
| --- | --- |
|  | **Justification** |
| **Month 25**  **Date:**  **\_\_\_\_\_\_\_\_\_\_\_\_** |  |
| **Month 26**  **Date:**  **\_\_\_\_\_\_\_\_\_\_\_\_** |  |
| **Month 27**  **Date:**  **\_\_\_\_\_\_\_\_\_\_\_\_** |  |
| **Month 28**  **Date:**  **\_\_\_\_\_\_\_\_\_\_\_\_** |  |
| **Month 29**  **Date:**  **\_\_\_\_\_\_\_\_\_\_\_\_** |  |
| **Month 30**  **Date:**  **\_\_\_\_\_\_\_\_\_\_\_\_** |  |
| **Month 31**  **Date:**  **\_\_\_\_\_\_\_\_\_\_\_\_** |  |
| **Month 32**  **Date:**  **\_\_\_\_\_\_\_\_\_\_\_\_** |  |
| **Month 33**  **Date:**  **\_\_\_\_\_\_\_\_\_\_\_\_** |  |