Usage of Waiver: Helping Current Program Participants Maintain Housing – Housing Relocation and Stabilization Services

**ESG Program**

On December 30, 2021, the Department of Housing and Urban Development issued a memorandum “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.” The memorandum outlined waivers of ESG Program grant requirements available to recipients of FY2021 ESG grants. On June 15, 2022, HUD issued a memorandum allowing recipients and subrecipients to request waivers for durational limits on Housing Relocation and Stabilization Services.

* Use of Waiver before March 31, 2022: [RECIPIENT NAME] notified the HUD San Francisco Regional Office of our intent to implement the Helping Current Program Participants Maintain Housing – Housing Relocation and Stabilization Services 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 Housing Relocation and Stabilization Services waiver on [DATE]. [RECIPIENT NAME] received approval from HUD by email on [DATE]
* Requested Expedited Regulatory Waiver after June 15, 2022: [RECIPIENT NAME] submitted an expedited regulatory waiver request to SNAPSinfo@hud.gov on [DATE]. CPD replied on [DATE] that the request was received. [RECIPIENT NAME] received approval from HUD on [DATE].

Note that this waiver is similar to a waiver provided in Notice CPD-21-08, which applied to FY2020 and CARES Act ESG funds but did not require notice to the Field Office.

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| **Limit to 24 Months of Utility Assistance Payments for Rapid Rehousing and Homelessness Prevention** |
| **The 24-month cap on housing relocation and stabilization payments and services for participants is waived** for participants who reach 24 months of assistance between December 30, 2021 and March 31, 2022. Assistance can continue, so long as it is still necessary to help participants reduce their risk of COVID-19 infection by obtaining or maintaining housing, through March 31, 2022.As of June 15, 2022, recipients and subrecipients may request a waiver on the 24-month cap on housing relocation and stablization payments and services for participants who for program participants who continue to need assistance beyond the 24-month limit(s) to maintain housing stability. HUD is also allowing expedited process of recipient requests to allow recipients to pay for housing stability case management for up to 60 days while the program participant is seeking housing.  |

# Instructions

This form documents the request of the Helping Current Program Participants Maintain Housing – Housing Relocation and Stabilization Services waiver. The waiver may only be used when necessary to help participants reduce their risk of COVID-19 infection by obtaining or maintaining housing, 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 Housing Relocation and Stabilization Assistance:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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| **The following additional documentation is included in the client’s file:** | **Checklist** |
| Documentation of 24 months of housing relocation and stabilization payments and services, with the payment for the 24th month between December 30, 2021 and March 31, 2022. |  |

# Good Cause Justification for Use of Waiver

Explain why it was necessary for the program to provide utility assistance beyond 24 months, in order to help participants reduce their risk of COVID-19 infection by obtaining or maintaining housing. The explanation must be specific to this client’s situation and the local conditions at this time (for example, heightened risk of contracting COVID-19 if the participant has to seek shelter in a congregate setting). 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.

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|  | **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:****\_\_\_\_\_\_\_\_\_\_\_\_** |  |