



# South Central Illinois Continuum of Care

400 West Pleasant Street  
P.O. Box 307  
Greenup, IL 62428-0307  
Phone: 217-923-3113  
Fax: 217-331-7021

*Providing services to the homeless in Calhoun, Christian, Clark, Clay, Coles, Crawford, Cumberland, Douglas, Edgar, Effingham, Fayette, Greene, Jasper, Jersey, Macoupin, Montgomery, Moultrie and Shelby counties*

## South Central Illinois Continuum of Care Interim Recordkeeping Standard Operating Guidance In Emergency Situations

The South Central Illinois Continuum of Care (SCILCoC) has developed the following interim guidance regarding recordkeeping in Emergency Situations. The first priority of housing providers is to continue to house participants during an emergency.

This interim guidance was developed in partnership with the local Department of Housing and Urban Development (HUD) Community Planning and Development (CPD) office and should be utilized until HUD’s Office of Special Needs Assistance Programs (SNAPS) provides further guidance.

The following interim guidance ensures accordance with 24 CFR 578.103(a). Agencies must establish standard operating procedures that ensure Continuum of Care program funds are used in accordance with the requirements of 24 CFR 578 and that sufficient records will be maintained to enable HUD to determine whether the agency, as a Recipient or Subrecipient, are meeting the requirements of this part. During Emergency Situations, agencies should make every effort to ensure the order of preference for documentation is maintained. Recipients and Subrecipients should also note the individual use of waivers in affected client files.

**Note – The original waivers were issued on March 31, 2020 for a six-month period. On September 30, 2020, the waivers were then renewed to extend to March 31, 2021.**

**\*Additional Note – on March 31, 2021, HUD renewed the waivers to extend to June 30, 2021.**

**\*Additional Note – on June 30, 2021, HUD renewed some of the waivers to extend to September 30, 2021 and some have been renewed to extend to December 31, 2021.**

### CoC Program

Program Requirement	Waiver Applicability	Recipient Documentation	Client-Level Documentation
Restriction of Rental Units at or Below FMR	For the 6-month period beginning March 31, 2020, the FMR restriction is waived for any lease executed by a Recipient or Subrecipient to provide transitional or permanent supportive	1) Documentation that FMR limits are impeding the grantee’s ability to find units for clients as a result of COVID-19	1) A copy of the lease clearly displaying the date of execution 2) A note to file noting the date of the COVID-19



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	<p>housing. Rental units must still meet rent reasonableness standards. *This waiver has been extended and is now in effect until December 31, 2021.</p>	<ol style="list-style-type: none"> <li>2) Copy of waiver notification sent to HUD</li> <li>3) Emergency recordkeeping policies and procedures</li> </ol>	<p>memorandum (March 31, 2020) and its application to the client's lease</p> <ol style="list-style-type: none"> <li>3) Completed rent reasonableness analysis</li> </ol>
<p>Disability Documentation for Permanent Supportive Housing</p>	<p>For the 6-month period beginning on March 31, 2020, the requirement that intake staff observation of disability be confirmed and accompanied by other evidence no later than 45 days from the application for assistance is waived for CoC-funded PSH. *This waiver is extended until December 31, 2021.</p>	<ol style="list-style-type: none"> <li>1) Documentation of COVID-19 related constraints preventing collection of disability documentation such as shelter-in-place orders or office closures.</li> <li>2) Copy of waiver notification sent to HUD</li> <li>3) Emergency recordkeeping policies and procedures</li> </ol>	<ol style="list-style-type: none"> <li>1) Copies of certifications</li> <li>2) A note in the files of affected clients outlining application of the waiver and compliance with the timeframe</li> </ol>



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<p>Limit on Eligible Housing Search and Counseling Services</p>	<p>For the 1-year period beginning on March 31, 2020, the limit on eligible housing search and counseling activities is waived. CoC Program funds may be used for up to 6 months of a program participant’s utility arrears and up to 6 months of a participants rent arrears <i>only when those arrears make it difficult to obtain housing.</i> *This waiver has been extended until December 31, 2021.</p>	<ol style="list-style-type: none"> <li>1) Emergency recordkeeping policies and procedures outlining how the grantee will define “difficulty obtaining housing”</li> <li>2) Copy of waiver notification sent to HUD</li> </ol>	<ol style="list-style-type: none"> <li>1) Documentation demonstrating the client’s inability to obtain housing as a direct result of rent and utility arrears</li> </ol>
<p>Housing Quality Standards (HQS) – Initial Physical Inspection of Unit</p>	<p>For the 6-month period beginning on March 31, 2020, the requirement to physically inspect each unit to assure the unit meets HQS before providing assistance is waived. Recipients and Subrecipients must visually inspect the unit using technology and have written policies to physically reinspect the unit within 3 months after health officials determine special COVID-19 prevention measures are no longer necessary. *This waiver has been extended and is in</p>	<ol style="list-style-type: none"> <li>1) Emergency recordkeeping policies and procedures that outline the reinspection process</li> <li>2) Copy of waiver notification sent to HUD</li> </ol>	<ol style="list-style-type: none"> <li>1) A completed HQS inspection form noting the method of observation, date, and a reference to the waiver</li> <li>2) By the 3-month deadline, a completed on-site inspection</li> </ol>



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	effect until September 30, 2021.		
HQS – Re-Inspection of Units	For the 1-year period beginning March 31, 2020, the annual HQS re-inspection requirement is waived. *This waiver has been extended to September 30, 2021.	<ol style="list-style-type: none"> <li>1) Copy of waiver notification sent to HUD</li> <li>2) Emergency recordkeeping policies and procedures</li> </ol>	<ol style="list-style-type: none"> <li>1) A note in the files of affected clients</li> </ol>
One-Year Lease Requirement	For the 6-month period beginning on March 31, 2020, the one-year lease requirement for PSH and RRH is waived. Initial lease term must be for more than one month. *This waiver has been extended and is now in effect until December 31, 2021.	<ol style="list-style-type: none"> <li>1) Documentation outlining constraints related to 1-year lease requirement</li> <li>2) Copy of waiver notification sent to HUD</li> <li>3) Emergency recordkeeping policies and procedures</li> </ol>	<ol style="list-style-type: none"> <li>1) A notation in the files of affected clients along with a copy of the lease indicating term</li> </ol>
RRH Limit to 24 Months of Rental Assistance	The 24-month rental assistance restriction is waived for RRH program participants who will have reached 24 months of assistance beginning on March 31, 2020 and until state or local public health officials determine that special measures are no longer necessary to prevent the spread of COVID-19. Program participants who have reached 24 months of rental assistance and who will not be able to	<ol style="list-style-type: none"> <li>1) Documentation outlining how Recipients will determine if a program participant will be unable to afford their rent</li> <li>2) Copy of waiver notification sent to HUD</li> <li>3) Emergency recordkeeping policies and procedures</li> </ol>	<ol style="list-style-type: none"> <li>1) Documentation that the participant is unable to afford their rent after 24 months of assistance</li> <li>2) A note in the files of affected clients</li> </ol>



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	<p>afford their rent without additional assistance will be eligible to receive rental assistance until 3 months after public health officials determine special measures are no longer necessary. *This waiver has been extended until December 31, 2021.</p>		
Assistance Available at Time of Renewal	<p>The requirement that the renewal grant amount is based on the budget line items in the final year of the grant being renewed is waived for all projects that amend their grant agreements between March 31, 2020 and October 1, 2020. This allows Recipients to amend their budgets temporarily to address the needs of participants in responding to COVID-19. *This waiver has been extended and is in effect until December 31, 2021.</p>	<ol style="list-style-type: none"> <li>1) A copy of the grant agreement amendment</li> <li>2) Emergency recordkeeping policies and procedures</li> </ol>	N/A
RRH Monthly Case Management	<p>For the 3-month period beginning May 22, 2020, the monthly case management requirement for RRH is waived.</p>	<ol style="list-style-type: none"> <li>1) Documentation of limited staff capacity, shelter-in-place order, or similar COVID-</li> </ol>	<ol style="list-style-type: none"> <li>1) A note in the files of affected clients outlining application of the waiver</li> </ol>



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	<p>*This waiver has been extended and is now in effect until September 30, 2021.</p>	<p>19 related impediment</p> <ol style="list-style-type: none"> <li>2) Copy of waiver notification sent to HUD</li> <li>3) Emergency recordkeeping policies and procedures</li> </ol>	
<p>Third Party Documentation of Income</p>	<p>The requirement that agencies must have third party documentation for income has been waived. It is acceptable for agencies to procure self-certification of income. Initial waiver terms are from September 30, 2020 until December 31, 2021.</p> <p>*This waiver has been extended and is still in effect until September 30, 2021.</p>	<ol style="list-style-type: none"> <li>1) Copy of waiver notification sent to HUD</li> <li>2) Emergency recordkeeping policies and procedures</li> </ol>	<ol style="list-style-type: none"> <li>1) A note in the files of affected clients</li> </ol>
<p>Suitable Dwelling Size and Housing Quality Standards</p>	<p>Beginning September 30, 2020 and ending March 31, 2021, the requirement that units funded with the CoC Program must have at least one bedroom or living/sleeping room for each two persons is waived.</p> <p>*This waiver has been extended and is in effect until December 31, 2021.</p>	<ol style="list-style-type: none"> <li>1) Copy of waiver notification sent to HUD</li> <li>2) Emergency recordkeeping policies and procedures</li> </ol>	<ol style="list-style-type: none"> <li>1) A note in the files of affected clients</li> </ol>



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<p>Homeless Definition – Temporary Stays in Institutions of 90 Days or Less</p>	<p>From September 30, 2020 until March 31, 2021, HUD waived the requirement that an individual may only stay in an institution for less than 90 days before they are no longer considered homeless. Under the waiver, individuals are allowed to keep their homeless status as long as they have not resided in the institution for longer than 120 days.          *This waiver was extended and is still in effect until December 31, 2021.</p>	<ol style="list-style-type: none"> <li>1) Copy of waiver notification sent to HUD</li> <li>2) Emergency recordkeeping policies and procedures</li> </ol>	<ol style="list-style-type: none"> <li>1) A note in the files of affected clients</li> </ol>
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The South Central Illinois Continuum of Care recommends the following steps during an emergency:

1. Agencies may use this document as their Emergency Recordkeeping Protocol as part of an Emergency Policy and Procedure.
2. Agencies will determine when an Emergency Situation occurs.
3. During the emergency, agencies will be working under the agency's Emergency Policies and Procedures, which includes an Emergency Recordkeeping Protocol.
4. During the emergency, agencies will describe the types of documentation impacted by the Emergency Situation and how the agency will make best efforts, given the emergency, to maintain records for the impacted types of documentation, including any guidance issued by HUD related to the emergency.
5. Staff will use the Recipient and client-level documentation listed in the tables above. Staff may need to document attempts for multiple types of documentation for one participant. Case notes should reflect the Emergency Situation and the protocol that was followed.
6. Agency determines the Emergency Situation has ended.
7. Staff will go back and acquire the documentation needed to meet the non-emergency type of documentation and ensure all documentation is present in case notes and file.