May 6, 2020

Dear Resident:

Per the CARES Act that was recently passed in Congress, Public Housing Authorities (PHAs) have been provided the opportunity to implement statutory and regulatory waivers to assist in addressing the Coronavirus/COVID-19 national emergency. The Hastings Housing Authority (HHA) has implemented the following waivers effective April 21, 2020 as they have been determined by our agency to be necessary for the safe and effective administration of our Housing Choice Voucher (HCV) program, consistent with the CARES Act and to prevent, prepare for, and respond to COVID-19.

**Family Income and Composition: Interim Examinations**

HUD is waiving the requirements to use the income verification hierarchy as described by PIH Notice 2018-18. HUD will allow PHAs to forgo third-party income verification requirements for interim reexaminations, including the required use of EIV. During the allowable period of eligibility, PHAs may consider self-certification as the highest form of income verification to process interim reexaminations. This may occur over the telephone (with a contemporaneous written record by the PHA staff person), through an email with a self-certification form by the family, or through other electronic communications.

Period of Availability: The period of availability ends on **July 31, 2020**.

**This waiver allows HHA to waive the use of EIV and 3rd party documentation for interim re-examinations. This will likely not affect you as the resident, but is more so a relief of administrative burden for HHA staff. HHA has opted to implement this waiver and will do so until July 31, 2020 unless circumstances change to where this is determined to no longer be necessary.**

**Initial Inspection Requirements**

HUD is waiving these requirements and providing an alternative requirement. In order to place the unit under HAP contract and commence making payments, the PHA may rely on the owner’s certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist in the unit or units in question instead of conducting an initial inspection. At minimum the PHA must require this owner certification. However, the PHA may add other requirements or conditions in addition to the owner’s certification but is not required to do so. The PHA is required to conduct an HQS inspection on the unit as soon as reasonably possible but no later than October 31, 2020.

This waiver and alternative requirement may also be applied to PHA-owned units if the independent entity is unable to perform the inspection.

Period of Availability: The period of availability for PHAs to accept owner’s self-certification

for an initial inspection ends on **July 31, 2020**. The period of availability for the PHA to inspect a unit that was placed under HAP contract based on the owner’s self-certification ends on **October 31, 2020**.

**This waiver and alternative requirement allows HHA to accept owner’s self-certification for an initial inspection through July 31, 2020. HHA has opted to implement this waiver on occupied units only. If the unit is unoccupied at the time of initial inspection, HHA will continue to inspect the unit per Housing Quality Standards. All units that are not inspected under this waiver using an owner’s self-certification will be inspected no later than October 31, 2020.**

**HQS Inspection Requirement – Biennial Inspections**

HUD is waiving this requirement and is allowing PHAs to delay biennial inspections for both tenant-based and PBV units. All delayed biennial inspections must be completed as soon as reasonably possible but no later than October 31, 2020. This waiver and alternative requirement may also be applied to PHA-owned units if the independent entity is unable to perform the inspection.

Period of Availability: The period of availability ends on **October 31, 2020**.

**HHA has opted to implement this waiver and alternative requirement allowing us to delay biennial inspections for Housing Choice Voucher Program participants. All of the delayed biennial inspections will be completed as soon as reasonably possible and no later than October 31, 2020.**

**HQS Interim Inspections**

HUD is waiving these requirements and establishing an alternative requirement for both tenant-based and PBV units. If the reported deficiency is life-threatening, the PHA must notify the owner of the reported life-threatening deficiency and that the owner must either correct the life-threatening deficiency within 24 hours of the PHA notification or provide documentation (e.g., text or email a photo to the PHA) that the reported deficiency does not exist. In the case of a reported non-life-threatening deficiency, the PHA must notify the owner of the reported deficiency within 30 days and the owner must either make the repair or document that the deficiency does not exist within 30 days of the PHA notification or any approved PHA extension. The PHA may add other requirements or conditions in addition to the owner’s documentation but is not required to do so. As is the case under the current HCV program requirements, the PHA is not required to conduct an on-site inspection to verify the repairs have been made but may rely on alternative verification methods (e.g., photos submitted by the owner, tenant certification, etc.).

This waiver may also be applied to PHA-owned units if the independent entity is unable to

perform the inspection.

Period of Availability: The period of availability ends on **July 31, 2020**.

**For residents of the Housing Choice Voucher Program, should an interim inspection be necessary, HHA has opted to implement this waiver and utilize alternate means of verification that an issue resulting in an HQS failed inspection has been resolved. After July 31, 2020, HHA will conduct all HQS inspections in accordance with HUD regulation.**

**HQS Quality Control Inspections**

The regulations require PHAs to conduct supervisory quality control inspections of a sampling of units under contract. HUD is waiving this regulatory requirement.

Period of Availability: The period of applicability ends on October 31, 2020.

**HHA has opted to implement this waiver, so no Quality Control inspections for the Housing Choice Voucher Program will be conducted until November 1, 2020. At that time, sufficient notice (a minimum of 48 hours) will be provided to you if your unit is selected for a Quality Control inspection.**

**Information When Family is Selected - PHA Oral Briefing**

The regulation requires when the PHA selects a family to participate in either the HCV or PBV program, the PHA must give the family an oral briefing. HUD is waiving this requirement and as an alternative requirement allowing the PHA to conduct the briefing by other means such as a webcast, video call, or expanded information packet. Section 504 and the ADA require PHAs to ensure effective communication with applicants, participants and members of the public in all communications and notices. The PHA must ensure that the method of communication for the briefing effectively communicates with, and allows for equal participation of, each family member, including those with vision, hearing, and other

communication-related disabilities, and ensures meaningful access for persons with limited English proficiency.

Period of Availability: The period of availability ends on **July 31, 2020**.

**HHA has implemented this waiver and is now offering our Voucher Briefing for new Housing Choice Voucher participants on our website and all paperwork and packets will be sent via mail. This will continue through July 31, 2020 or until circumstances change to where this is determined to no longer be necessary.**

**Term of Voucher – Extensions of Term**

HUD is waiving the requirement that the extension(s) must be in accordance with the PHA’s administrative plan in order to allow the PHA to provide extensions even though it has been unable to formally amend its policy in the administrative plan.

Period of Availability: The period of availability ends on **July 31, 2020.**

**HHA has opted to implement this waiver for individuals being issued vouchers through July 31, 2020. This allows our office to provide people searching for a unit through the Housing Choice Voucher Program the maximum number of 120 days to search for a unit without requiring them to request voucher extensions. Beginning August 1, 2020, HHA will resume only allowing individuals 60 days to search for a unit, with two extensions of 30 days allowed for those that request them in writing.**

**Automatic Termination of HAP contract**

Description: When an HCV family’s income increases to the extent that the housing

assistance payment is reduced to $0, PHAs are required by this regulation to automatically

terminate HAP contracts 180 days after the last housing assistance payment to the owner. In

recognition that the COVID-19 emergency is creating economic and employment instability

for many families, as well as situations where families may on a temporary basis be adding

members whose additional income may result in a $0 HAP subsidy calculation, HUD is

waiving this requirement. As an alternative requirement, the PHA, upon written notice to the

owner and family, **may extend the period of time following the last payment to the owner**

**that triggers the automatic termination of the HAP contract. The extension beyond the**

**normally applicable 180 days is determined by the PHA but may not extend beyond**

**December 31, 2020.**

Period of Availability: The period of availability for the extension ends **December 31, 2020**.

The PHA may not extend the HAP contract beyond December 31, 2020.

**This waiver pertains to families on the Housing Choice Voucher Program who are currently at or may go to zero housing assistance payments (HAP), meaning they are paying the full rent with no assistance from the Housing Authority. HHA has opted to implement the temporary extension of not terminating the HAP contract for those families through December 31, 2020.**

Please note that HHA may revert to the standard program rules at any time during the period of availability of these regulatory waivers. Housing & Urban Development (HUD), through PIH notice, may also extend the period of availability if deemed necessary.

Please contact our office if you have any questions or concerns regarding any of these waivers or changes to the way HHA is operating during the Coronavirus/COVID-19 national and local emergency.

Thank you for your understanding and cooperation during this time.

Sincerely,

Hastings Housing Authority