



COVID-19 Administrative Plan Adjunct for FY2020 – Version 3

Purpose

Pursuant to the authority provided under the Coronavirus Aid, Relief and Economic Security (CARES) Act (Public Law 116-136), HUD is waiving and establishing alternative requirements for numerous statutory and regulatory requirements for the Public Housing program, Housing Choice Voucher (HCV) program, Indian Housing Block Grant (IHBG) program, and Indian Community Development Block Grant (ICDBG) program. These waivers provide administrative flexibilities and relief to public housing agencies (PHAs), Indian tribes, and tribally designated housing entities (TDHEs) in response to the COVID-19 national emergency. With respect to the Public Housing and HCV programs, use of these waivers is at the discretion of the PHA; however, HUD strongly encourages PHAs to utilize any and all waivers and alternative requirements as necessary to keep Public Housing and HCV programs operational to the extent practicable.

COVID-19 Waivers and Policies noted below will override current Administrative Plan regulations and policies. The COVID-19 policy will expire when the COVID-19 waiver expires, unless noted otherwise in the COVID-19 policy. All COVID-19 waiver end dates are subject to change based upon potential future waiver modifications from HUD.

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PHA 5-Year and Annual Plan Submission Dates, Significant Amendment Requirements

Current Regulation and Policy:

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1-III.D. UPDATING AND REVISING THE PLAN

The PHA will revise this administrative plan as needed to comply with changes in HUD regulations. The original plan and any changes must be approved by the board of commissioners of the agency, the pertinent sections included in the Agency Plan, and a copy provided to HUD.

PHA Policy

The PHA will review and update the plan at least once a year, and more often if needed, to reflect changes in regulations, PHA operations, or when needed to ensure staff consistency in operation.

COVID-19 Waiver PHA 5-Year and Annual Plan Submission Dates, Significant Amendment Requirements

Due to the potential postponement of public hearings due to limitations on large public gatherings, HUD is waiving these requirements, and providing alternative deadlines for some PHAs. Specifically, HUD is establishing an alternative requirement under which PHAs with 6/30/20 or 9/30/20 fiscal year-end (FYE) dates must submit their 5-Year (if due in 2020) and Annual Plans or civil rights certification for qualified PHAs no later than 10/18/20 (75 days before 1/1/21) and PHAs with 12/31/20 FYE dates must submit their 5-Year (if due in 2020) and annual plans no later than 1/16/21(75 days before 4/1/21). Please see the chart below:

PHA FYE	Revised Submission Requirement	Revised Due Date
6/30/20 and 9/30/20	75 days before 1/1/21	10/18/20
12/31/20	75 days before 4/1/21	1/16/21

Unless HUD subsequently revises this waiver authority and alternative requirement, PHAs with FYE dates of 3/31 are not impacted by this waiver and are required to submit the 5-Year (if due in 2020) and Annual Plan no later than 75 days before the commencement of their fiscal years.

In addition, the statute and regulations further provide that a significant amendment or modification to the Annual Plan may not be adopted until the PHA has duly called a meeting of its board of directors (or similar governing body) and the meeting, at which the amendment or modification is adopted, is open to the public, and that notification of the amendment or modification is provided to and approved by HUD.

HUD is waiving these requirements and establishing an alternative requirement that any change to a PHA policy, except for changes related to Section 18, Section 22, or the Rental Assistance Demonstration (RAD), that would normally trigger significant amendment requirements of the PHA Plan, may be effectuated without completing the significant amendment process.

The PHA is required to notify public housing residents and HCV families of any impacts that the significant amendment may have on them by whatever means it considers most effective as soon as practicable. As noted earlier, HUD recognizes that the COVID-19 public health emergency presents unique challenges from a staffing and communication perspective and encourages PHAs to adapt their communications in consideration of local conditions and resources. For example, a PHA may need to initially provide this notification by placing information on its website and as a voice-mail message and following up with more formal written notice as circumstances allow. All materials, notices, and communications must be clearly communicated and provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with Section 504 of the Rehabilitation Act (Section 504) and HUD's Section 504 regulation, and Titles II or III of the Americans with Disabilities Act (ADA) and implementing regulations.

COVID-19 Waiver Expires:

The period of availability for the waiver of the significant amendment process ends on December 31, 2020. The period of availability for the 5-Year/Annual Plan submission varies depending on the end date of the PHA fiscal year. Please see the description section above.

COVID-19 Policy Effective: April 24, 2020

COVID-19 Policy:

HFG will submit its Annual Plan on or before October 18, 2020
HFG will not engage in a significant amendment process except for changes related to Section 18, Section 22, or the Rental Assistance Demonstration (RAD), that would normally trigger significant amendment requirements of the PHA Plan, may be effectuated without completing the significant amendment process HFG will notify families of any impacts that the significant amendment may have on them by whatever means it considers most effective as soon possible.

Annual and Interim Reexams – Income, Asset and Medical Deduction Verification Requirements

Current Regulation and Policy:

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7-I.B. OVERVIEW OF VERIFICATION REQUIREMENTS

HUD's Verification Hierarchy [Notice PIH 2017-12]

HUD mandates the use of the EIV system and offers administrative guidance on the use of other methods to verify family information and specifies the circumstances in which each method will be used. In general HUD requires the PHA to use the most reliable form of verification that is available and to document the reasons when the PHA uses a lesser form of verification.

In order of priority, the forms of verification that the PHA will use are:

- Up-front Income Verification (UIV) using HUD's Enterprise Income Verification (EIV) system
- Up-front Income Verification (UIV) using a non-HUD system
- Written Third-Party Verification (may be provided by applicant or participant)
- Written Third-party Verification Form
- Oral Third-party Verification
- Self-Certification

Each of the verification methods is discussed in subsequent sections below.

Requirements for Acceptable Documents

PHA Policy

Any documents used for verification must be the original (not photocopies) and generally must be dated within 60 days of the date they are provided to the PHA. The documents must not be damaged, altered or in any way illegible.

Print-outs from Web pages are considered original documents.

The PHA staff member who views the original document must make a photocopy, annotate the copy with the name of the person who provided the document and the date the original was viewed, and sign the copy.

Any family self-certifications must be made in a format acceptable to the PHA and may be signed in the presence of a PHA representative or notary public.

COVID-19 WAIVER Annual and Interim Reexams – Income, Asset and Medical Deduction Verification Requirements

HUD is waiving the requirements to use the income hierarchy described by PIH Notice 2018-18 and will allow PHAs to forgo third-party income verification requirements for annual reexaminations, including the use of EIV. During the allowable period of availability, PHA's may consider self-certification as the highest form of income verification to process annual and interim reexamination. This may occur over the telephone (but must be documented by PHA staff with a contemporaneous written record), through an e-mail or postal mail with a self-certification form by the tenant, or through other electronic communications. PHAs are encouraged to incorporate procedures to remind families of the obligation to provide true and complete information when adopting these flexibilities.

COVID-19 Waiver Expires:

Under PIH Notice 2020-33 the expiration date has now been updated to June 30, 2021.

Prior Expiration

Under PIH2020-13 (HA) Rev-1 issued 07.02.2020 expiration has been updated to December 31, 2020. Prior expiration date was July 31, 2020.

COVID-19 Policy Effective: April 24, 2020

COVID-19 Policy:

HFG may accept self-certification as the highest form of income, asset and/or medical deductions verification if tenant states they are unable to provide third party documentation.

HFG may collect self-certification of income, assets and/or medical deductions via postal mail, e-mail, fax, text or phone. Tenant must acknowledge perjury statement via postal mail, e-mail, fax, text or phone.

Self-certification collected via phone must be transcribed into a word document and placed into the ETR.

EIV will be used for Annual Reexams.

EIV will not be used for Interim Reexams.

Enterprise Income Verification (EIV) Monitoring on a Monthly Basis

Current Regulation and Policy

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Upfront Income Verification Using HUD's Enterprise Income Verification (EIV) System (Mandatory)

PHAs must use HUD's EIV system in its entirety as a third-party source to verify tenant employment and income information during mandatory reexaminations or recertifications of family composition and income in accordance with 24 CFR 5.236 and administrative guidance issued by HUD. The EIV system contains data showing earned income, unemployment benefits, social security benefits, and SSI benefits for participant families. The following policies apply to the use of HUD's EIV system. The data shown on income reports is updated quarterly. Data may be between 3 and 6 months old at the time reports are generated.

PHA Policy

The PHA will obtain income reports for annual reexaminations on a monthly basis. Reports will be generated as part of the regular reexamination process.

Income reports will be compared to family-provided information as part of the annual reexamination process. Income reports may be used in the calculation of annual income, as described in Chapter 6-I.C. Income reports may also be used to meet the regulatory requirement for third party verification, as described above. Policies for resolving discrepancies between income reports and family-provided information will be resolved as described in Chapter 6-I.C. and in this chapter.

Income reports will be used in interim reexaminations to identify any discrepancies between reported income and income shown in the EIV system, and as necessary to verify earned income, and to verify and calculate unemployment benefits, Social Security and/or SSI benefits. EIV will also be used to verify that families claiming zero income are not receiving income from any of these sources.

Income reports will be retained in participant files with the applicable annual or interim reexamination documents.

When the PHA determines through income reports and third-party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 14, Program Integrity.

COVID-19 WAIVER Enterprise Income Verification (EIV) Monitoring on a Monthly Basis

HUD is waiving the mandatory EIV monitoring requirements.

COVID-19 Waiver Expires:

Under PIH Notice 2020-33 the expiration has been updated to June 30, 2021

Prior Expiration

Under PIH2020-13 (HA) Rev-1 issued 07.02.2020 expiration has been updated to December 31, 2020. Prior expiration date was July 31, 2020.

COVID-19 Policy Effective: April 24, 2020

COVID-19 Policy:

HFG is discontinuing mandatory EIV monitoring requirements except for deceased tenants and multiple subsidy reports.

Housing Quality Standards (HQS) Inspections for Tenant-Based Vouchers, Pre-HAP Contract Inspections, PBV Turnover Unit Inspections and HQS Inspections to Add or Substitute Units (PBV)

Current Regulation and Policy

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8-II.B. INITIAL HQS INSPECTION [24 CFR 982.401(a)]

Initial Inspections [FR Notice 1/18/17]

The PHA may, but is not required to, approve assisted tenancy and start HAP if the unit fails HQS inspection, but only if the deficiencies identified are non-life-threatening. Further, the PHA may, but is not required to, authorize occupancy if a unit passed an alternative inspection in the last 24 months.

PHA Policy

The unit must pass the HQS inspection on or before the effective date of the HAP contract. The PHA will not rely on alternative inspections and will conduct an HQS inspection for each unit prior to executing a HAP contract with the owner.

COVID-19 Waiver Housing Quality Standards (HQS) Inspections for tenant-based vouchers, Pre-HAP contract Inspections, PBV Turnover Unit Inspections and HQS Inspections to Add or Substitute Units (PBV)

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.

COVID-19 Waiver Expires:

The period of availability for a PHA to accept an owner's self-certification for an initial inspection ends on June 30, 2021. For any unit for which a PHA accepted an owner's self-certification, the PHA must conduct an HQS Inspection as soon as reasonably possible but no later than the 1-year anniversary of the date of the owner's certification.

Prior Expiration

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. Under PIH2020-13 (HA) Rev-1 issued 07.02.2020 expiration has been updated to: The period of availability for the waiver to place a unit under HAP contract and commence payments ends on December 31, 2020. For any unit for which a PHA entered into a HAP contract and commenced payment pursuant to this alternative requirement, the PHA must conduct an HQS inspection as soon as reasonably possible but no later than the 1-year anniversary of the date of the owner's certification.

COVID-19 Policy Effective: April 24, 2020

COVID-19 Policy:

For unoccupied units, the unit must pass the HQS inspection on or before the effective date of the HAP contract.

For unoccupied units, HFG will not rely on alternative inspections and will conduct an HQS inspection for each unit prior to executing a HAP contract with the owner.

For unoccupied units in which air quality due to wildfires or other natural disasters results in HFG not being able to inspect in person or occupied units, HFG will accept owner's written certification that the owner has no reasonable basis to have knowledge that life threatening conditions exist in the unit or units in question.

For occupied units or unoccupied units in which air quality due to wildfires or other natural disasters results in HFG not being able to inspect in person, HFG will accept owner's written certification that the owner has no reasonable basis to have knowledge that life threatening conditions exist in the unit or units in question.

Life threatening conditions include:

- Any condition that jeopardizes the security of the unit
- Major plumbing leaks or flooding, waterlogged ceiling or floor in imminent danger of falling
- Natural or LP gas or fuel oil leaks
- Any electrical problem or condition that could result in shock or fire
- Absence of a working heating system when outside temperature is below 60 degrees Fahrenheit
- Utilities not in service, including no running hot water
- Conditions that present the imminent possibility of injury
- Obstacles that prevent safe entrance or exit from the unit
- Absence of a functioning toilet in the unit

- Inoperable or missing smoke detectors

Owner's written statement must include the perjury statement.

For occupied units HFG will complete an exterior Lead Based Paint inspection if applicable.

For unoccupied units in which air quality due to wildfires or other natural disasters results in HFG not being able to inspect in person HFG will not complete an exterior Lead Based Pain inspection if applicable.

For occupied units well water testing and waivers and/or installation of tie downs or waivers will be completed prior to HQS approval.

For occupied units or unoccupied units in which air quality due to wildfires or other natural disasters results in HFG not being able to inspect in person HFG HFG will conduct an HQS inspection on the unit as soon as reasonably possible but no later than October 31, 2020.

Homeownership Option – Initial HQS Inspection

Current Regulation and Policy

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15-VII.G. HOME INSPECTIONS, CONTRACT OF SALE, AND PHA DISAPPROVAL OF SELLER [24 CFR 982.631]

Home Inspections

The PHA may not commence monthly homeownership assistance payments for a family until the PHA has inspected the unit and has determined that the unit passes HQS.

PHA Policy

When the family locates a home they wish to purchase and submits a copy of their purchase offer/contract, the PHA will conduct a housing quality standards (HQS) inspection within 10 business days. Any items found not to meet HQS must be repaired before the unit can be determined eligible for the homeownership program.

An independent professional inspector selected by and paid for by the family must also inspect the unit. The independent inspection must cover major building systems and components, including foundation and structure, housing interior and exterior, and the roofing, plumbing, electrical, and heating systems. The independent inspector must be qualified to report on property conditions, including major building systems and components.

The PHA may not require the family to use an independent inspector selected by the PHA. The independent inspector may not be a PHA employee or contractor, or other person under control of the PHA. However, the PHA may establish standards for qualification of inspectors selected by families under the homeownership option.

PHA Policy

The family must hire an independent professional inspector, whose report must be submitted to the PHA for review. This inspector must be a member of the American Society of Home Inspectors (ASHI) or other recognized professional society, or a licensed engineer. The inspector may not be a PHA employee.

The PHA may disapprove a unit for assistance based on information in the independent inspector's report, even if the unit was found to comply with HQS.

PHA Policy

The PHA will review the professional report in a timely fashion and, based on the presence of major physical problems, may disapprove the purchase of the home.

If the PHA disapproves the purchase of a home, the family will be notified in writing of the reasons for the disapproval.

COVID-19 Waiver Homeownership Option – Initial HQS Inspection

The statute provides that HQS re-inspections are not required for homeownership vouchers but does not exempt the unit from the initial HQS inspection. The regulation provides that the PHA may not commence monthly homeownership assistance payments until the PHA has inspected the unit and determined that the unit passes HQS. HUD is waiving this requirement. However, the family is still required to obtain an independent professional inspector in accordance with § 982.631(b)(1) and the PHA is still required to review the independent inspection and has discretion to disapprove the unit for assistance under the homeownership option because of information in the inspection report in accordance with § 982.631(b)(4).

COVID-19 Waiver Expires:

Under PIH Notice 2020-33 the period of availability ends on June 30, 2021.

Prior Expiration

Under PIH2020-13 (HA) Rev-1 issued 07.02.2020 expiration has been updated to December 31, 2020. Prior expiration date was July 31, 2020.

COVID-19 Policy Effective: April 24, 2020

COVID-19 Policy:

For unoccupied units, When the family locates a home they wish to purchase and submits a copy of their purchase offer/contract, HFG will conduct a housing quality standards (HQS) inspection within 10 business days. Any items found not to meet HQS must be repaired before the unit can be determined eligible for the homeownership program.

For occupied units, HFG will not complete an HQS inspection.

An independent professional inspector selected by and paid for by the family must also inspect the unit. The independent inspection must cover major building systems and components, including foundation and structure, housing interior and exterior, and the roofing, plumbing, electrical, and heating systems. The independent inspector must be qualified to report on property conditions, including major building systems and components.

HFG may not require the family to use an independent inspector selected by the PHA. The independent inspector may not be a PHA employee or contractor, or other person under control of the PHA. However, the PHA may establish standards for qualification of inspectors selected by families under the homeownership option.

The family must hire an independent professional inspector, whose report must be submitted to the PHA for review. This inspector must be a member of the American Society of Home Inspectors (ASHI) or other recognized professional society, or a licensed engineer. The inspector may not be a PHA employee.

HFG may disapprove a unit for assistance based on information in the independent inspector's report, even if the unit was found to comply with HQS.

HFG will review the professional report in a timely fashion and, based on the presence of major physical problems, may disapprove the purchase of the home.

If HFG disapproves the purchase of a home, the family will be notified in writing of the reasons for the disapproval.

Delaying HQS Biennial Inspections

Current Regulation and Policy

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8-II.C. ANNUAL/BIENNIAL HQS INSPECTIONS [24 CFR 982.405 and 982.406; Notice PIH 2016-05]

PHA Policy

Each unit under HAP contract must be inspected biennially within 24 months of the last full HQS inspection. The PHA reserves the right to require annual inspections of any owner at any time.

The PHA will not rely on alternative inspection standards.

COVID-19 Waiver Delaying HQS Biennial Inspections

HUD is allowing PHAs to delay biennial inspections for both tenant-based and PBV units.

Under this waiver authority, PHAs may delay biennial inspections for both tenant-based and PBV units and instead, 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 units or units in question instead of conducting an initial inspection. At minimum, the PHA must require this owner's certification. However, the PHA may add other requirements or conditions in addition to the owner's certification but is not required to do so.

COVID-19 Waiver Expires:

The PHA must resume biennial inspections by June 30, 2021 and must conduct all delayed biennial inspections no later than December 31, 2021

Prior Expiration

Under PIH2020-13 (HA) Rev-1 issued 07.02.2020 expiration has been updated to December 31, 2020. Prior expiration date was October 31, 2020.

COVID-19 Policy Effective: April 24, 2020

COVID-19 Policy:

HFG may delay biennial inspections for tenant-based units and PBV units until June 30, 2021

HQS Interim Inspections aka Special Inspections

Current Regulation and Policy

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8-II.D. SPECIAL INSPECTIONS [24 CFR 982.405(g)]

If a participant or government official reports a life-threatening condition which the owner would be required to repair within 24 hours, the PHA must inspect the unit within 24 hours of notification. If the reported condition is not life-threatening, the PHA must inspect the unit within 15 days of notification.

PHA Policy

During a special inspection, the PHA generally will inspect only those deficiencies that were reported. However, the inspector will record any additional HQS deficiencies that are observed and will require the responsible party to make the necessary repairs.

If the annual inspection has been scheduled or is due within 90 days of the date the special inspection is scheduled the PHA may elect to conduct a full annual inspection.

COVID-19 Waiver HQS Interim Inspections aka Special Inspections

HUD is 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 photos to the PHA) that the reported deficiency does not exist. In the case of a reported non-life-threatening, 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. 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.

COVID-19 Waiver Expires:

The period of availability ends on June 30, 2021. After June 30, 2021, the PHA must conduct the HQS inspection in accordance with the applicable time periods upon notification by a family or government official that the assisted unit does not comply with the HQS.

Prior Expiration

Under PIH2020-13 (HA) Rev-1 issued 07.02.2020 expiration has been updated to December 31, 2020. Prior expiration date was July 31, 2020. After December 31, 2020, the PHA must conduct the HQS inspection in accordance with the applicable time periods upon notification by a family or government official that the assisted unit does not comply with the HQS.

COVID-19 Policy Effective: April 24, 2020

COVID-19 Policy:

HFG will accept a written statement from both the owner and tenant that the unit meets HQS in order to resolve interim inspection aka special inspection fail items.

The written statement from owner and tenant must contain the perjury statement.

If owner and tenant present conflicting statements HFG will collect other forms of proof of fails or repairs that owner or tenant can provide (e.g., photos, receipts, 3rd party documentation, etc.)

HFG will determine a fail or pass rating based upon the preponderance of the evidence.

HQS Quality Control Inspections

Current Regulation and Policy

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8-II.E. QUALITY CONTROL INSPECTIONS [24 CFR 982.405(b); HCV GB, p. 10-32]

HUD requires a PHA supervisor or other qualified person to conduct quality control inspections of a sample of units to ensure that each inspector is conducting accurate and complete inspections and that there is consistency in the application of the HQS.

The unit sample must include only units that have been inspected within the preceding 3 months. The selected sample will include (1) each type of inspection (initial, annual, and special), (2) inspections completed by each inspector, and (3) units from a cross-section of neighborhoods.

COVID-19 Waiver HQS Quality Control Inspections

HUD is waiving this regulatory requirement

COVID-19 Waiver Expires:

Under PIH Notice 2020-33 the period of availability ends on June 30, 2021.

Prior Expiration

Under PIH2020-13 (HA) Rev-1 issued 07.02.2020 expiration has been updated to December 31, 2020. Prior expiration date was July 31, 2020.

COVID-19 Policy Effective: April 24, 2020

COVID-19 Policy:

HFG is discontinuing Quality Control aka Monitor inspections. HFG will resume Quality Control Inspections in **July 2021**

PHA Approval of Assisted Tenancy – When HAP Contract is Executed

Current Regulations and Policy

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9-I.G. HAP CONTRACT EXECUTION [24 CFR 982.305]

Any HAP contract executed after the 60-day period is void, and the PHA may not pay any housing assistance payment to the owner.

COVID-19 Waiver PHA Approval of Assisted Tenancy – When HAP Contract is Executed

HUD is waiving the regulatory requirement to allow PHAs to execute the HAP contract after the 60-day deadline has passed and make housing assistance payments back to the beginning of the lease term. However, the PHA and owner must execute the HAP contract no later than 120 days from the beginning of the lease term.

COVID-19 Waiver Expires:

Under PIH Notice 2020-33 the period of availability to execute the HAP contract after the normally 60-day period from the beginning of the lease term ends on June 30, 2021.

Prior Expiration

Under PIH2020-13 (HA) Rev-1 issued 07.02.2020 expiration has been updated to December 31, 2020. Prior expiration date was July 31, 2020.

COVID-19 Policy Effective: April 24, 2020

COVID-19 Policy:

Any HAP Contract executed after the 120-day period is void, and HFG may not pay any housing assistance payment to the owner.

Absence from Unit

Current Regulation and Policy

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3-I.L. ABSENT FAMILY MEMBERS

Individuals may be absent from the family, either temporarily or permanently, for a variety of reasons including educational activities, placement in foster care, employment, illness, incarceration, and court order.

Definitions of Temporarily and Permanently Absent

PHA Policy

Generally, an individual who is or is expected to be absent from the assisted unit for 180 consecutive days or less is considered temporarily absent and continues to be considered a family member. Generally, an individual who is or is expected to be absent from the assisted unit for more than 180 consecutive days is considered permanently absent and no longer a family member.

COVID-19 Waiver Absence from Unit

HUD is waiving the 180-day requirement. HUD is allowing the PHA at its discretion to continue housing assistance payments and not terminate the HAP contract due to extenuating circumstances (e.g., hospitalization, extended stays in nursing homes, caring for family member). The PHA may not make payments beyond December 31, 2020 and the HAP contract will terminate on that date if the family is still absent from the unit.

COVID-19 Waiver Expires:

The period of availability for the PHA to choose to continue making HAP payments despite the family's absence of more than 180 consecutive days ends on June 30, 2021. The PHA may not make payments beyond June 30, 2021, and the HAP contract will terminate on that date if the family is still absent from the unit.

Prior Expiration

December 31, 2020

COVID-19 Policy Effective: April 24, 2020

COVID-19 Policy:

HFG will assess on a case by case basis why a tenant is absent from the unit.

Absence from the assisted unit that is not related to a COVID-19 event that extends beyond 180 consecutive days will result in the tenant being considered permanently absent and no longer a family member.

Absence from the assisted unit that is related to a COVID-19 event that extends beyond 180 consecutive days will not result in the tenant being considered permanently absent. Absent member will still be considered a family member.

HFG may use self-certification, third party documentation, etc. to assess why tenant is absent from the unit. Determination of whether absence from the unit is COVID-19 related or not will be based upon a preponderance of the evidence.

SEMAP

Current Regulation and Policy

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16-V.B. SEMAP CERTIFICATION [24 CFR 985.101]

PHAs must submit the HUD-required SEMAP certification form within 60 calendar days after the end of its fiscal year.

COVID-19 Waiver SEMAP

For a PHA with a fiscal year ending on or before December 31, 2020, HUD will not issue a new SEMAP score unless the PHA requests that a new SEMAP score be issued. HUD will instead carry forward the most recent SEMAP score on record.

COVID-19 Waiver Expires:

In accordance with PIH Notice 2020-33 HUD will resume issuing new SEMAP scores beginning with PHAs with fiscal year end dates of June 30, 2021.

Prior Expiration

HUD will resume issuing new SEMAP scores beginning with PHAs with fiscal year end dates of March 31, 2021.

COVID-19 Policy Effective: April 24, 2020

COVID-19 Policy:

HFG will not request a SEMAP score from HUD for FY2020.

Homeownership Option – Homeownership Counseling

Current Regulation and Policy

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5-VII.F. HOMEOWNERSHIP COUNSELING [24 CFR 982.630]

Before commencement of homeownership assistance for a family, the family must attend and satisfactorily complete the pre-assistance homeownership and housing counseling program required by the PHA. HUD suggests the following topics for the PHA-required pre-assistance counseling:

- Home maintenance (including care of the grounds);
- Budgeting and money management;
- Credit counseling;
- How to negotiate the purchase price of a home;
- How to obtain homeownership financing and loan pre-approvals, including a description of types of financing that may be available, and the pros and cons of different types of financing;
- How to find a home, including information about homeownership opportunities, schools, and transportation in the PHA jurisdiction;
- Advantages of purchasing a home in an area that does not have a high concentration of low income families and how to locate homes in such areas;
- Information on fair housing, including fair housing lending and local fair housing enforcement agencies; and
- Information about the Real Estate Settlement Procedures Act (12 U.S.C. 2601 et seq.) (RESPA), state and Federal truth-in-lending laws, and how to identify and avoid loans with oppressive terms and conditions.

The PHA may adapt the subjects covered in pre-assistance counseling (as listed) to local circumstances and the needs of individual families.

The PHA may also offer additional counseling after commencement of homeownership assistance (ongoing counseling). If the PHA offers a program of ongoing counseling for participants in the homeownership option, the PHA shall have discretion to determine whether the family is required to participate in the ongoing counseling.

If the PHA does not use a HUD-approved housing counseling agency to provide the counseling, the PHA should ensure that its counseling program is consistent with the counseling provided under HUD's Housing Counseling program.

PHA Policy

COVID-19 Waiver Homeownership Counseling

The Department is waiving briefing and counseling sessions to permit families to purchase a

home without fulfilling the normally applicable pre-assistance homeownership counseling requirements, though HUD encourages families to continue the sessions that can be accomplished in accordance with social distancing directives.

COVID-19 Waiver Expires:

Under PIH Notice 2020-33 the period of availability ends on June 30, 2021

Prior Expiration

Under PIH2020-13 (HA) Rev-1 issued 07.02.2020 expiration has been updated to December 31, 2020. Prior expiration date was July 31, 2020.

COVID-19 Policy Effective: April 24, 2020

COVID-19 Policy

HFG will temporarily waive the Homeownership counseling requirement but will work to connect residents to online resources for Homeownership education and will provide one on one support for residents wanting to purchase their own home.

Utility Allowance Schedule: Required Review and Revision

Current Regulation and Policy

Pg. 16-9 Admin Plan

A PHA-established utility allowance schedule is used in determining family share and PHA subsidy. The PHA must maintain a utility allowance schedule for (1) all tenant-paid utilities, (2) the cost of tenant-supplied refrigerators and ranges, and (3) other tenant-paid housing services such as trash collection.

The utility allowance schedule must be determined based on the typical cost of utilities and services paid by energy-conservative households that occupy housing of similar size and type in the same locality. In developing the schedule, the PHA must use normal patterns of consumption for the community as a whole, and current utility rates.

The utility allowance must include the utilities and services that are necessary in the locality to provide housing that complies with housing quality standards. Costs for telephone, cable/satellite television, and internet services are not included in the utility allowance schedule.

In the utility allowance schedule, the PHA must classify utilities and other housing services according to the following general categories: space heating; air conditioning; cooking; water heating; water; sewer; trash collection; other electric; cost of tenant-supplied refrigerator; cost of tenant-supplied range; and other specified housing services.

The cost of each utility and housing service must be stated separately by unit size and type. Chapter 18 of the *HCV Guidebook* provides detailed guidance to the PHA about establishing utility allowance schedules.

Air Conditioning

An allowance for air-conditioning must be provided when the majority of housing units in the market have central air-conditioning or are wired for tenant-installed air conditioners.

PHA Policy

The PHA has not included an allowance for air-conditioning in its schedule. Central air-conditioning or a portable air conditioner is not a common practice in Lane County.

COVID-19 Waiver Utility Allowance Schedule: Required Review and Revision

The regulations require the PHA to review its schedule of utility allowances each year and revise its allowance for a utility category if there has been a change of 10 percent or more in the utility rate since the last time the utility allowance schedule was revised. HUD is waiving this requirement to allow PHAs to delay the review and update of utility allowances.

COVID-19 Waiver Expires:

Under PIH Notice 2020-33 the period of availability ends on June 30, 2021

Prior Expiration

Any review and update of utility allowances that were due at some point in time in CY2020 must be completed no later than December 31, 2020.

COVID-19 Policy: HFG will review and update any utility category if there has been a change of 10 percent or more by December 31, 2020.