

PIH NOTICE 2020-15/ ISSUED 4/10/2020 / COVID-19 WAIVERS/CARES ACT
FOR HCV program

Annual Recertifications – Income Verifications

- Waiver is needed
- Hud is waiving the requirements to use the income hierarchy and will allow PHA's to forego third-party income, including the use of EIV
- Tenant self-certification will be the highest form of income verification – Waiver ends 7-31-2020
 - Telephone (must be documented by TMHA staff)
 - Email
 - Postal Mail
 - Or any other electronic communicationTMHA must incorporate procedures to remind families of the obligation to provide true and complete information.

Interim Recertifications – Administrative Plan already has an interim policy

- Waiver is needed
- Hud is waiving the requirements to use the income hierarchy and will allow PHA's to forego third-party income, including the use of EIV
- Tenant self-certification will be the highest form of income verification – Waiver ends 7-31-2020
 - Telephone (must be documented by TMHA staff)
 - Email
 - Postal Mail
 - Or any other electronic communication
- TMHA must incorporate procedures to remind families of the obligation to provide true and complete information.

Family Self-Sufficiency Contract Extension

- Waiver is needed
- Hud has made a determination that circumstances surrounding COVID-19 qualifies as a “good cause” to give family eligibility an extension – waiver ends 12-31-2020

Waiting List: Opening and Closing

- No waiver needed – we are not opening or closing it during this time

Housing Quality Standards Inspections

- Waiver is needed
- Must inspect the units as soon as reasonably possible when it is safe to do so – Waiver ends 7-31-2020

Initial Inspection Requirements

- Waiver is needed
- HUD is waiving the inspection on the new unit with the owner self-certification. Waiver ends 7-31-2020
- In order to place the unit under HAP and commence making payments

- The owner must self-certify that there are no life threatening conditions existing in the unit – at minimum TMHA must require this waiver. However TMHA may add other requirements or conditions
- TMHA is required to do an inspection on the property as soon as possible – waiver ends 10-31-2020

Initial Inspection – Non Life Threatening Deficiencies

- Waiver is needed
- HUD is waiving the requirement that a PHA must withhold the paying if NLT repairs are not made within 30 days.
- Instead TMHA may provide an extension of up to an additional 30 days to owner. If owner fails to complete those repairs by the end of PHA extension the PHA must withhold payment – waiver ends 7-31-2020

HQS Initial Inspection requirement – Alternative Inspection Option

- Waiver is needed
- Under the waiver, PHA may commence assistance payments at the beginning of the lease term based on alternative inspection and the owner's certification
- Inspection must be conducted no later than 10-31-2020

HQS Interim Inspections

- Waiver is needed
- HUD is waiving the requirement on life threatening condition. If the PHA is notified of a life threatening deficiency the PHA must notify the owner of that deficiency and that the owner must correct the deficiency within 24 hours of notification or provide documentation that the reported deficiency does not exist – wavier ends 7-31-2020
- Hud is waiving the requirement for non-life threatening conditions. 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 the 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 with current HCV requirements, the PHA is not required to conduct on-site inspection to verify the repairs have been made but may rely on alternative methods such as photos submitted by owner, tenant/owner certification repairs are done, etc.

HQS Quality Control Inspections

- Waiver is needed
- HUD is waiving this regulatory requirement – waiver ends 10-31-2020

Homeownership Option – Initial HQS inspection

- Waiver is needed
- HUD is waiving the initial HQS inspection on the unit. 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 - waiver ends 7-31-2020

Administrative Plan

- Waiver is needed
- HUD is waiving the requirement to allow the PHA administrative plan to be revised on a temporary basis without Board Approval
- As an alternative requirement any informally adopted revisions under this waiver authority must be formally adopted as soon as practicable following 6-30-2020 but no later than 7-31-2020

PHA Oral Briefing

- Waiver is not needed
- We are still doing an Oral Briefing but they are now one-on-one briefings – waiver ends 7-31-2020

Term of Voucher – Extensions

- Waiver is needed
- Hud is waiving the requirement that the extension must be in accordance with the Administrative Plan in order to allow the PHA to provide extensions even though it is unable to formally amend its policy in the administrative plan – waiver ends 7-31-2020