



COVID-19 WAIVER STATEMENT: 7/13/2020

In HUD PIH Notice 2020-13 (HA), REV-1 (“Notice”), HUD exercises its authority under the CARES Act to establish waivers and administrative flexibilities to provide relief to Public Housing Agencies (PHAs, such as the Housing Authority of the City of Hartford) responding to the COVID-19 pandemic. The Notice lists waivers and alternative requirements for numerous statutory and regulatory requirements for the Low-Income Public Housing (LIPH) program and Housing Choice Voucher (HCV) program that PHAs may employ. As a condition of waiver use, HUD requires PHAs to:

- post publicly or otherwise make available to the public a list of all waivers and alternative requirements the PHA chooses to employ; and
- notify affected residents and owners of the impact of the PHA-employed waivers and alternative requirements.

This chart lists the waivers adopted by the PHA and the PHA’s intended period of use. Each section is followed by the impact of the waiver or alternative requirements, if any, on PHA applicants, participants, and participating property owners.

HOUSING QUALITY STANDARDS WAIVERS				
Item	Authority	Summary of the Waiver	Availability Period	PHA Adoption
HQS-5: ¹ HQS Inspection Requirement: Biennial Inspections for Tenant-Based and PBV Vouchers	<u>Statutory Authority</u> Section 8(o)(D) <u>Regulatory Authority</u> 24 CFR § 982.405(a); 24 CFR § 983.103(d)	<ul style="list-style-type: none"> • Delay in biennial inspections • Delayed biennial inspections must be completed as soon as reasonably possible but by no later than 1 year after the date on which the biennial inspection would have been required absent the waiver 	<ul style="list-style-type: none"> • May delay inspections due before 10/31/2020² • All delayed inspections must be completed as soon as reasonably possible but no later than one year after inspection was due 	3/16/202

IMPACT ON HCV (SECTION 8) PARTICIPANTS & OWNERS

For HCV participants:

- Units will not be inspected at re-examination to protect family members and inspectors from potential COVID-19 exposure
- Participants must continue to request special inspections for life-threatening conditions
- Participants may request special inspections for non-life-threatening conditions; PHA will review requests balanced against the COVID-19 risks

For owners with HCV HAP contracts:

- Must continue to make life-threatening repairs in 24-hours
- Must still make timely repairs to unit

¹ Note: does not waive the requirement for quality control inspections found in 24 CFR § 982.405(b), but reduced inspections means reduced QC inspections.

² Date does not appear in the Notice’s text but does appear in the Attachment I summary.

HOUSING CHOICE VOUCHER (HCV/SECTION 8) WAIVERS

Item	Authority	Summary of the Waiver	Availability Period	PHA Adoption
HCV-3: Term of Voucher - Extensions of Term	<u>Regulatory Authority</u> § 982.303(b)(1)	<ul style="list-style-type: none"> PHAs may provide voucher extensions regardless of current PHA policy 	<ul style="list-style-type: none"> 12/31/2020, when original policy restored 	3/16/2020

IMPACT ON HCV (SECTION 8) APPLICANTS & PARTICIPANTS

For HCV applicants and participants:

- PHA may grant as many extensions as necessary if COVID-19 conditions continue to make locating a unit difficult for applicants and participants
- PHA may require that applicant or participant document and report effort to locate a unit when extensions are made that exceed those permitted by policy

HCV-4: PHA Approval of Assisted Tenancy - When HAP Contract is Executed	<u>Regulatory Authority</u> 24 CFR § 982.305(c)	<ul style="list-style-type: none"> PHA may accept HAP contracts not executed within 60 days PHA will make retroactive HAP payments for contracts executed after 60 days PHA will not pay HAP to owner until HAP contract is executed and received by PHA 	<ul style="list-style-type: none"> 12/31/2020, when original policy restored 	3/16/2020
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IMPACT ON HCV (SECTION 8) APPLICANTS, PARTICIPANTS & OWNERS

For HCV applicants and participants:

- Does not change policy that the tenant may not move into unit until rental agreement (lease) is signed and PHA approved term starts

For owners that should have HCV HAP contracts:

- PHA will not pay its portion of the rent until HAP contract signed and received by the PHA
- PHA will retroactively pay all months from beginning of agreed upon term once executed HAP contract received by PHA

Item	Authority	Summary of the Waiver	Availability Period	PHA Adoption
HCV-5: Absence from Unit	<u>Regulatory Authority</u> 24 CFR § 982.312	<ul style="list-style-type: none"> PHA may permit absences from units longer than 180 days PHA will not make HAP payments beyond 12/31/20 for units vacant more than 180 consecutive days 	<ul style="list-style-type: none"> 12/31/2020, when original policy restored 	3/16/2020

IMPACT ON HCV (SECTION 8) PARTICIPANTS

For HCV participants:

- With documented extenuating circumstances (e.g., hospitalization, extended stays at nursing homes, caring for family members), PHA may permit family to be absent from the unit for more than 180 days
- PHA has final say on whether the extenuating circumstances are related to COVID-19
- Circumstances not related to COVID-19 are still subject to the 180-day limit on absence from the unit
- Extensions to the 180-day absence limit all end on 12/31/2020 when the original policy is restored; families out of unit for more than 180 days must be back in unit before 12/31/2020

HCV 6: Automatic Termination of HAP Contract	<u>Regulatory Authority</u> 24 CFR § 982.455	<ul style="list-style-type: none"> PHA may extend the period of time after the last HAP payment is made before program participation and the HAP contract terminate automatically 	<ul style="list-style-type: none"> 12/31/2020, when original policy restored 	3/16/2020
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ALTERNATIVE REQUIREMENT

The PHA, upon written notice to the owner and the participant family, may extend the period of time following the last payment to the owner that triggers the automatic termination of the HAP contract. The PHA will determine the extension beyond 180 days, but it may not extend automatic termination beyond 12/31/2020.

IMPACT ON HCV (SECTION 8) PARTICIPANTS & OWNERS

For HCV participants and owners:

- If notified by the PHA, HCV participation will not automatically end after 180 days of no HAP payments (e.g., tenant is paying entire contract rent)

For owners that have HCV HAP contracts:

- The PHA will continue to enforce all HCV program requirements, including Housing Qualify Standards, inspections, Tenancy Addendum lease provisions, annual re-examinations, etc.

LOW-INCOME PUBLIC HOUSING (LIPH) WAIVERS

Item	Authority	Summary of the Waiver	Availability Period	PHA Adoption
PH-12: Public Housing Agency Annual Self- Inspections	<u>Statutory Authority</u> Section 6(f)(3) <u>Regulatory Authority</u> 24 CFR § 902.20(d)	<ul style="list-style-type: none"> PHA need not inspect each project in 2020 	<ul style="list-style-type: none"> 12/31/2020, when original policy restored 	7/2/2020 ³

IMPACT ON PARTICIPANTS

For LIPH participants:

- PHA will not automatically inspect participant tenant's units during 2020
- PHA will continue to expeditiously identify, respond to, and address serious conditions that could jeopardize life or property
- PHA will complete inspection of every public housing unit during 2021, in accordance with its original policy

³ Waiver new as of PIH 2020-13, issued 7/2/2020.

PHAS, SEMAP, AND UNIFORM FINANCIAL REPORTING STANDARDS WAIVERS

Item	Authority	Summary of the Waiver	Availability Period	PHA Adoption
§ 11(a): PHAS	<u>Regulatory Authority</u> 24 CFR Part 902	<ul style="list-style-type: none"> • HUD will not conduct REAC inspections • PHA to retain prior year PHAS score unless it requests otherwise • PHA not making request for updated scoring 	<ul style="list-style-type: none"> • HUD will resume issuing new PHAS scores for this PHA in 2022 for FYE 12/31/2021 	Automatically applied by HUD

IMPACT ON PARTICIPANTS & OWNERS

None.

§ 11(b): SEMAP	<u>Regulatory Authority</u> 24 CFR Part 985	<ul style="list-style-type: none"> • PHA to retain prior year SEMAP score unless it requests otherwise • PHA not making request for updated scoring 	<ul style="list-style-type: none"> • HUD will resume issuing new SEMAP scores for this PHA in 2022 for FYE 12/31/2021 	Automatically applied by HUD
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IMPACT ON PARTICIPANTS & OWNERS

None.

§ 11(c): Uniform Financial Reporting Standards: Filing of Financial Reports; Reporting Compliance Dates	<u>Regulatory Authority</u> 24 CFR § 5.801(c); 24 CFR § 5.801(d)(1)	<ul style="list-style-type: none"> • PHA given extension of financial reporting deadlines • PHA anticipates that its external audit may not be completed on time and it will utilize the additional time if necessary 	<ul style="list-style-type: none"> • Unaudited financial information due originally due 2/29/2020 now due 8/31/2020 • Audited financial information originally due 9/30/2020 now due 3/31/2021 	Automatically applied by HUD
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IMPACT ON PARTICIPANTS & OWNERS

None.