

Moving To Work:

Innovation and Flexibility to Address
America's Affordable Housing Challenges

December 2020



MOVING TO WORK COLLABORATIVE

The Moving to Work (MTW) Collaborative is a nonprofit membership organization established in 2018 that advocates on behalf of MTW communities, educates on MTW issues, and works to broaden the MTW program.

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Contact

MTW Collaborative
455 Massachusetts Avenue NW
Suite 425
Washington DC 20001

mtw@mtwcollaborative.org
202-638-1300

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INTRODUCTION

The U.S. government's creation of the Moving to Work (MTW) demonstration program in 1996 unleashed innovation in housing assistance programs for households with low income in diverse communities across the United States. The public housing authorities selected to participate in the MTW program received the flexibility essential to creating localized strategies that most effectively meet their communities' needs while achieving the program's statutory objectives: use federal dollars more efficiently; help residents to become more financially self-reliant; and improve housing choices for families with low income.

MTW agencies consistently have implemented successful initiatives in the more than two decades since the demonstration program began. Participating public housing authorities continue to provide the housing assistance needed by the families they serve, while also expanding the opportunities available to these households.

The MTW program allows participating public housing authorities to develop local alternatives to many of the rules that typically apply to federal housing voucher and public housing programs and allows flexibility in the use of federal funds.

The onset and continuation of the COVID-19 global pandemic in 2020 manifested the importance of these types of exemptions and funding flexibility to all public housing authorities. In response to the COVID-19 pandemic, the U.S. Department of Housing and Urban Development (HUD) implemented several waivers of rules and regulations. These waivers have enabled public housing authorities to continue to serve households with low income during the COVID-19 pandemic, when the ability to maintain a stable home is paramount. Many of these flexibilities were already in practice at MTW agencies with a proven track record of success. Public housing authorities have demonstrated their ability to provide essential housing assistance without the level of regulation that previously existed.

To help low-income families, seniors and individuals with disabilities have opportunities to improve their quality of life, it is essential for local agencies to be provided with the flexibility to choose the options that show the greatest success in their communities. As local agencies make these decisions, they continue to be held accountable by HUD and local governing bodies and their communities at large.

For these reasons, the MTW Collaborative, a nonprofit membership organization that advocates on behalf of current and future MTW agencies, proposes applying the MTW program enacted in 1996—and continued with contracts through 2028—to all public housing agencies, other than those identified by HUD as “troubled,” to provide them with the structure and flexibility to design programs in their communities.

In addition, the MTW Collaborative has identified flexibilities and waivers, described in greater detail later in this report, that should be extended permanently to all public housing agencies based on the success they have already achieved and the promise they offer to help provide housing assistance for households with low income.

MOVING TO WORK – HISTORY

The federal Omnibus Consolidated Rescissions and Appropriations Act of 1996 authorized the creation of the MTW demonstration program, with 30 initial participating public housing authorities. The legislation passed with overwhelming bipartisan support in the U.S. House of Representatives by a vote of 399 to 25 and the U.S. Senate by a vote of 88 to 11. President Bill Clinton signed it into law on April 26, 1996.

This action established a significant tool to provide affordable housing opportunities, combining the flexibility to foster innovation with continuing government oversight from HUD. Public housing authorities must submit their proposed new MTW programs to HUD for approval.

By 2015, the MTW program had expanded to include 39 public housing authorities nationwide, 1 percent of the approximately 3,400 public housing authorities in the United States.

The Consolidated Appropriations Act of 2016 authorized the extension of contracts between HUD and these 39 Signature MTW agencies for 10 more years, through 2028, on the existing terms and conditions without disruptions. The legislation further authorized the expansion of the MTW program to an additional 100 public housing authorities. Much like the original MTW authorizing statute, the legislation passed with strong bipartisan support—in the U.S. House of Representatives by a vote of 316 to 113, and in the U.S. Senate by a vote of 65 to 33. President Barack Obama signed it into law on December 18, 2015.

HUD published the final “Operations Notice for the Expansion of the Moving to Work (MTW) Demonstration Program” in the Federal Register on August 28, 2020. HUD also published a timeline to complete the expansion of the MTW program by 100 additional agencies by spring 2022.

The same funding and regulatory flexibilities available for Signature MTW agencies should be provided to these additional agencies. These flexibilities work together to enable Signature MTW agencies to achieve the statutory objectives envisioned and enacted to create the MTW program.

MTW FLEXIBILITY AND HUD WAIVERS TO EXTEND

With the combination of funding and policy flexibilities available through the Signature MTW program, participating public housing authorities develop and implement a variety of creative, locally driven programs to serve their residents. Several MTW initiatives have been expanded to public housing agencies at a national level.

In addition, many of the waivers HUD implemented in response to COVID-19 have demonstrated significant promise for providing housing assistance in communities across the country. These types of waivers, implemented in the context of the MTW program's thoughtful approach to developing localized alternatives to HUD regulations, should be extended to all public housing authorities.

Funding Flexibility

MTW agencies have the flexibility to use a variety of federal funds interchangeably, which helps them develop creative solutions to provide housing assistance.

For example, funding for MTW agencies contains a combination of funds for public housing operations, public housing capital expenditures and Section 8 Housing Choice Vouchers. MTW agencies determine how to use the funds for their programs, subject to HUD's approval of MTW initiatives through each agency's MTW Annual Plan. This flexibility also helped MTW agencies rapidly respond to local needs during the COVID-19 pandemic. With this type of flexibility, public housing authorities can achieve results like the following examples.

- **Affordable Housing Development – Seattle Housing Authority**

Since joining MTW, the Seattle Housing Authority (SHA) has increased the number of affordable housing units it owns by nearly 1,000 units. The funding flexibility through MTW, including the ability to hold internal reserves for strategic investments, has been critical to this accomplishment.

One of SHA's key strategies is to set aside a portion of MTW funds to create three distinct internal funding pools that spur development and ensure project completion:

- a revolving predevelopment fund that is paid back when projects receive financing,
- a future-building fund for planning and feasibility of potential projects, and
- an unexpected encounters fund to help ensure that projects can address unanticipated circumstances, such as the discovery of contaminated dirt, and complete development.

In 2016, a fire destroyed one of two buildings at the 51-unit Lam Bow Apartments. Costs to replace the building would exceed insurance funds because of the discovery of a liquefaction zone on the site and the high cost to retrofit the remaining building. With the help of the predevelopment revolving fund, SHA invested in creating a plan to replace

the destroyed units and redevelop the entire site to increase the total number of units by more than 50 percent. The Lam Bow Apartments project is expected to start construction in the first quarter of 2021 and will be completed by the end of 2022.

SHA also uses its funding flexibility to encourage more equitable development by others. For example, in Seattle, only 2 percent of the standard rental housing stock has three or more bedrooms, and only a small fraction of that housing is affordable to families with low incomes. As a result, low-income families in Seattle, who are more likely to be people of color, are pushed out of the city. Larger housing units typically do not work out in the financing for affordable housing development deals, and few financial incentives exist for developers to include family-sized units in their buildings. Most affordable housing developments being built in Seattle include few or no family-sized units. Using its MTW flexibility, SHA recently created a “buy-up program” that provides capital incentives to affordable housing developers who build in a High Opportunity Neighborhood to include three-bedroom or larger units in their developments. To date, this program has created 32 affordable three-bedroom units in a High Opportunity Neighborhood at a major transit-oriented design project and is in the process of supporting an additional approximately 20 three-bedroom units in a separate High Opportunity Neighborhood in Seattle.

- **Homelessness Solutions – San Diego Housing Commission**

The San Diego Housing Commission’s (SDHC) leadership role in addressing homelessness has expanded exponentially since 2010. The agency’s annual budget for homelessness programs now exceeds more than \$100 million.

SDHC’s MTW status has allowed SDHC to leverage its available resources to address homelessness through [HOUSING FIRST – SAN DIEGO](#), SDHC’s homelessness action plan, which launched on November 12, 2014. One of the components essential to the success of HOUSING FIRST – SAN DIEGO is SDHC’s commitment of federal rental housing vouchers.

As an MTW agency, on July 1, 2010, SDHC became one of the initial public housing agencies in the nation to receive HUD’s approval to use its federal rental housing voucher funding to provide long-term housing to San Diegans experiencing homelessness.

Out of SDHC’s more than 16,000 rental housing vouchers funded by HUD, SDHC has committed approximately 4,300 vouchers to provide long-term housing for individuals and families experiencing homelessness. These vouchers have an estimated annual value of \$45.6 million.

In addition, HOUSING FIRST – SAN DIEGO includes several SDHC MTW initiatives, such as:

- **SDHC Moving Home Rapid Rehousing.** This program helps individuals and families experiencing homelessness to quickly obtain and maintain permanent

housing through a tailored package of assistance that can include rental assistance and case management. SDHC also has committed 50 rental housing units that it owns, annually, to provide housing through the Moving Home program.

- **SDHC Moving On Rental Assistance.** SDHC partners with the County of San Diego Behavioral Health Services Division to provide rental assistance to individuals who previously experienced homelessness who are ready to transition out of permanent supportive housing, but continue to need rental assistance.
- **Guardian Scholars Program.** SDHC provides rental assistance for up to 100 San Diego State University (SDSU) students who have been homeless or at risk of homelessness.
- **Monarch School Project.** SDHC provides rental housing vouchers for up to 25 families who have at least one child enrolled at the Monarch School, one of the few schools in the nation specifically serving children experiencing homelessness.

SDHC also has invested MTW funds to create new permanent affordable housing units with supportive services for individuals experiencing homelessness. This includes SDHC's award-winning rehabilitation of the historic [Hotel Churchill](#) in downtown San Diego, which provides 72 permanent supportive housing units, predominantly for veterans who experienced homelessness, and SDHC's purchase of the 120-unit [Village North Senior Garden Apartments](#), with 44 units now set aside for seniors who experienced homelessness. SDHC provides federal rental housing vouchers to help the residents of these 44 units pay their rent.



Former HUD Secretary Julián Castro and U.S. Representative Scott Peters [toured the construction](#) of the Hotel Churchill rehabilitation, and Representative Peters and U.S. Representative Juan Vargas spoke at the [grand opening](#).

- **Affordable Housing Preservation Program – Keene Housing (New Hampshire)**

Keene Housing's Affordable Housing Preservation Program (AHPP) builds on the successes of similar initiatives at other MTW agencies. The program leverages the subsidy provided by the Enhanced Voucher program [Section 8(t) of the U.S. Housing Act] to preserve properties that would otherwise either be removed from HUD's multifamily housing portfolio.

AHPP provides property owners the option to opt out of an expiring Project-Based Section 8 contract and convert their properties to Project-Based Vouchers (PBV) with Keene Housing. Vouchers sometimes provide higher payments than multifamily housing

contracts, so entering into a PBV Housing Assistance Payment contract can provide owners access to additional rental revenue and private equity for capital improvements. Additionally, moving from Project-Based Section 8 to PBV frees owners from HUD Management Reviews as well as restrictions on reserve capitalization and use. Keene Housing provides residents the option of remaining in place and converting their Enhanced Voucher to a PBV or taking their Enhanced Voucher to the private market, at which time Keene Housing will, in most cases, provide a PBV for the vacant unit.

- **Homeownership Opportunities – Atlanta Housing Authority**

To provide families with low or moderate income the opportunity to achieve the dream of homeownership, the Atlanta Housing Authority created a Down Payment Assistance (DPA) Program.

Families that previously received rental assistance from the Atlanta Housing Authority and qualified professionals and paraprofessionals in the fields of education, public safety and healthcare receive priority and a higher level of assistance through DPA. Families can combine funds they receive through DPA with other down-payment assistance programs.

DPA has helped more than 1,100 families become homeowners since the program began, and the Atlanta Housing Authority estimates in its Fiscal Year 2021 MTW Annual Plan that the program will assist more than 350 households in the current fiscal year.

DPA Homeownership Program At-A-Glance					
DPA Category	FY 2017	FY 2018	FY 2019	FY 2020*	FY 2021^
Number of Families Assisted	76	149	265	306	383
Avg. DPA Award	\$17,687	\$21,407	\$20,916	\$20,003	\$20,003
Avg. Household Income	\$41,454	\$41,932	\$42,828	\$44,734	\$42,737
Area Median Income	\$67,500	\$69,700	\$74,800	\$79,700	\$84,250
Avg. Home Price	\$142,792	\$155,022	\$166,486	\$179,673	\$160,993
Priority Professionals (%)	24%	34%	26%	26%	28%

*Data Source: DPA Smart Sheet as of October 31, 2019 and extrapolated by MTW Office through June 30, 2020

^Data Source: DPA Smart Sheet analyzed and projected out by MTW Office through June 30, 2021

- **Homelessness Solutions – King County Housing Authority (Seattle, Washington)**

The King County Housing Authority (KCHA) has developed unique subsidy models to address homelessness in the community. KCHA has dedicated more than 4,500 subsidized housing units to people with disabilities or experiencing homelessness, and each year, approximately 50 percent of new admissions into KCHA's federally subsidized programs report experiencing homelessness prior to admission. KCHA's partnership pilot programs include:

- **“Sponsor-Based” Rental Assistance.** KCHA provides housing funds directly to behavioral health care and nonprofit partners. These providers use the funds to secure private market rentals, which they then sub-lease to program participants, operating under the “Housing First” model. When a resident ready for more independent living, KCHA offers a move-on strategy through a tenant-based voucher.
- **“Step-down” Rent Structure.** Designed by youth service providers, this approach provides a flexible, graduated reduction in rental assistance over time, in coordination with supportive services, instead of an immediate end of assistance after 18 or 24 months. A resource specialist works with youth transitioning out of homelessness to help them move into housing in the private rental market and prepare them to take over the lease after stabilizing and progressing on personal goals.
- **While in School Housing Program (WISH) Partnership.** A partnership with Highline Community College through WISH, this program provides up to 54 months of tenant-based rental subsidies to college students experiencing homelessness, while leveraging existing on-campus services that support students beyond their housing needs.
- **Student and Family Stability Program (SFSI).** This program combines short-term rental assistance with housing stability and employment navigation services for families experiencing homelessness or at risk of homelessness.
- **Supportive Housing.** This initiative extends the allowable term of Housing Assistance Payment (HAP) contracts to help KCHA's nonprofit partners in underwriting and leveraging private financing for the development of supportive housing. This initiative has enabled KCHA to provide project-base rental subsidies that are critical for ongoing operating support at more than 70 nonprofit-owned housing developments.
- **Passage Point Re-entry Program.** Parents attempting to reunify with their children following a period of incarceration obtain supportive housing through this program, which coordinates between the criminal justice system and Washington State's child welfare agency. Passage Point residents may remain in place until they have completed the reunification process, are stabilized in employment, and are able to succeed in a less service-intensive environment.

- **Social Services – INLIVIAN (Charlotte Housing Authority)**

In fulfillment of the MTW statutory goal of helping families achieve self-sufficiency, INLIVIAN is utilizing its MTW funding flexibility to invest in a social service delivery model that the agency believes best maximizes the role of housing as a stabilizing force in a family's overall well-being. INLIVIAN has used its MTW funding flexibility to significantly bolster the provision of social services through CORE Programs, Inc. (CORE). A 501(c)(3) operating as a mini-social service agency, CORE represents the fulfillment of INLIVIAN's vision of being more than a sticks-and-bricks housing provider.

CORE staff members are trained to address the complex issues of poverty and uncover barriers to self-reliance. CORE professionals work with residents to establish and achieve life goals, creating new pathways out of poverty. In addition to having the capacity to provide direct services, CORE has established a solid network of local and national partners that bring to bear a host of community resources to which CORE connects INLIVIAN households. For families and children, the focus is self-sufficiency. For seniors and persons with disabilities, the focus is well-being.

Composed of a team of over 40 staff, including certified Life Coaches, the CORE model is unique to housing authorities, as most agencies do not have access to the resources needed to provide a comparable level of both direct and indirect supports to the households they serve.

The block grant also funds a series of incentives and services related to childcare, transportation, scholarships, training, employment readiness, health supports and technical assistance for resident leadership. INLIVIAN provides this at a scale that most public housing authorities cannot. In recent years, the suite of CORE programming has impacted the lives of over 3,000 households in the public housing, Rental Assistance Demonstration, and tenant-based voucher programs. The level of investment in CORE has allowed for the INLIVIAN to move toward expanding the agency's work requirement, inclusive of offering case management and supportive services to work-able residents.

While INLIVIAN dedicates 6 percent of its budget to CORE, in 2020 CORE leveraged the investment of the MTW block grant into an additional \$500,000 in social/health/employment services and technology grant funding for INLIVIAN households.

The funding flexibility supporting CORE's operations has also made it possible for INLIVIAN to execute many of the agency's MTW regulatory flexibilities focused on self-sufficiency activities, including:

- Opportunity Housing Program—focused on facilitating upward mobility by opening up access to high-opportunity neighborhoods
- Work Requirement
- Destination HomeOwnership

MTW funding flexibility has also allowed for the provision of security services at INLIVIAN communities. INLIVIAN utilized MTW funding flexibility to support safety and security at its public housing sites, inclusive of closed-circuit television (CCTV) and security personnel, prior to the portfolio conversion to the Rental Assistance Demonstration (RAD) Program. After the RAD conversion, the agency upgraded its CCTV technology at all of its properties. During the COVID-19 pandemic, additional MTW funding has been used to increase on-site security. Through the INLIVIAN CCTV network and command center, security professionals monitor the safety of INLIVIAN's communities, working in partnership with the Charlotte-Mecklenburg Police Department to deter and address criminal activity.

Alternative Rent Policies

Reasonable, measured rent reform would benefit the Section 8 Housing Choice Voucher rental assistance program and its participants moving forward. In some communities, rent reform that includes setting minimum rents and utilizing calculations based on income ranges effectively encourages rental assistance participants to become more financially self-reliant and provides the support they need to do so. MTW agencies have demonstrated the successful implementation of this type of alternative rent policy, including hardship protections to help residents. For example, the San Diego Housing Commission and Housing Authority of the County of San Bernardino have implemented alternative rent policies that show the impact public housing authorities can achieve if they have this type of flexibility.

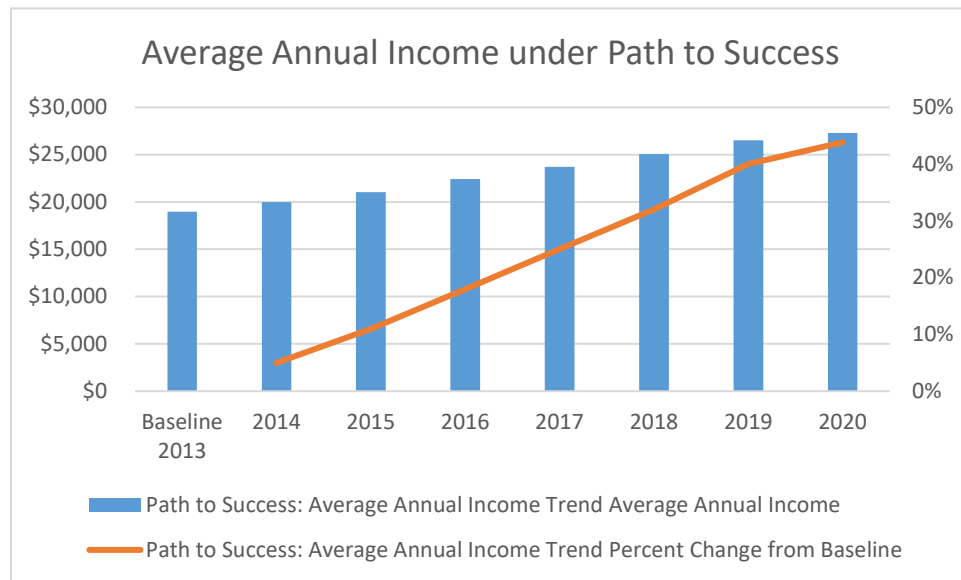
- **Path to Success – San Diego Housing Commission**

The San Diego Housing Commission (SDHC) serves families with low income or experiencing homelessness in the City of San Diego—the eighth largest city in the country and second largest in California.

In Fiscal Year 2020, SDHC provided federal rental assistance to 16,691 families, which included more than 38,000 family members.

With the flexibility MTW provides, SDHC created the Path to Success initiative to encourage Section 8 Housing Choice Voucher families to become more financially self-reliant.

The average annual income of households identified as able to work (Work-Able) has increased 44 percent since the Path to Success initiative was implemented, beginning on July 1, 2013.



Path to Success included streamlining the calculations of the portion of the rent that each household pays and modified the method used to determine the monthly rent payment amounts for families that receive rental assistance from SDHC and its public housing residents.

Under Path to Success, SDHC identifies Housing Choice Voucher rental assistance participants as Work-Able or Elderly/Disabled.

A household is Work-Able if at least one adult is under 55, not disabled, and not a full-time student between the ages of 18-23. Elderly/Disabled households are those in which all adults are 55 or older, disabled, or a full-time student ages 18 to 23.

For Elderly/Disabled households with income, the rent payment amount is calculated as 28.5 percent of their adjusted income. There is no minimum monthly rent payment amount for Elderly/Disabled households.

Path to Success set minimum monthly rent payment amounts for Work-Able participants, which were most recently adjusted effective January 1, 2020, to reflect changes in the minimum wage in the state of California. The current minimum rents are \$400 per month for a household with one Work-Able adult and \$650 per month for a household with two or more Work-Able adults.

With California's minimum wage of \$13 per hour, the combined income for two Work-Able adults—each working part-time, 20 hours per week—is about \$2,253 per month. The minimum rent of \$650 dollars is 28.8 percent of their income.

Work-Able families pay either the minimum monthly rent payment amount or the rent payment amount based on the family's annual income, whichever is greater.

To allow Work-Able families to increase their income without being penalized, adjusted annual income is separated into income ranges. The lower edge of the range is used to calculate the family's rent payment at 30 percent of the adjusted monthly income. For example, the monthly rent payment amount for any family with adjusted annual income between \$25,000 and \$29,999 is calculated using \$25,000 as their income.

As a complement to the Path to Success initiative, SDHC also recertifies rental assistance families' income and household composition every two years (biennial) for most SDHC rental assistance programs.

Households benefit from this reform because any increase in income is not captured until the second year. This provides families with additional time to build savings accounts, increase skill levels to become more marketable, complete secondary education or job training programs, or obtain employment.

The biennial recertification also produces additional administrative efficiencies and generates cost savings for SDHC.

SDHC's Path to Success initiative also includes temporary hardship exemptions, with provisions that help families work toward financial self-reliance.

If a family's income is reduced to zero through no fault of their own, their portion of the rent will be zero for up to six months.

- **Streamlined Lease Assistance Program – Housing Authority of the County of San Bernardino**

The Streamlined Lease Assistance Program is an alternative subsidy/rent schedule initiative for Section 8 Housing Choice Voucher and public housing participants. With this initiative, the Housing Authority of the County of San Bernardino (HACSB) streamlined the rent calculation for participating households.

Depending on the household type, the portion of the rent the household pays is calculated as either 24 percent or 30 percent of their gross annual income. A minimum rent portion also applies. Deductions and allowances are not applied to the calculated rent amount because HACSB based the percentages on an analysis that included the deductions and allowances that traditional program regulations allow.

Households participate in one of two programs, based on the type of household:

- **Fixed Assistance Program for Elderly/Disabled Households:** The portion of the rent that households in this program pay is the highest of three available options: a percentage of their gross income (24 percent if the household joined this program before January 1, 2019, or 30 percent if they joined after January 1, 2019); the minimum rent, or the baseline rent for the duration of their rental assistance.

- **Tiered Assistance Program for Non-Elderly/Non-Disabled Households:** In this program, the household also pays a portion of the rent based on the highest of three options: 30 percent of their gross income, the minimum rent or the baseline rent. The percentage of gross income may increase by 3 percent, up to a maximum of 36 percent, at each biennial income recertification.

In its Fiscal Year 2019 MTW Annual Report, HACSB reported that the average annual earned income of households under this alternative rent policy rose from \$4,454 before implementation to \$5,995 in Fiscal Year 2019, or 34.5 percent.

Family Self-Sufficiency Program

The Family Self-Sufficiency (FSS) Program provides opportunities to become more financially self-reliant for families that receive Section 8 Housing Choice Voucher rental assistance or reside in public housing. Participating families enter into an FSS Contract of Participation that explains the rights and responsibilities of the participant and the public housing authority. The contract usually is for five years, but it can be extended with HUD’s approval. The public housing authority and the participant also agree on an individual training and services plan that outlines a series of goals for the participant and the services and resources available to help them take the steps necessary to achieve their goals.

MTW agencies have used their MTW flexibilities to develop customized FSS programs to meet the needs of their households. This has included changing the term of the program and the incentives provided to families for reaching educational and career milestones. Extending this option to all public housing authorities and allowing public housing authorities to extend FSS contracts without HUD approval will help families achieve greater economic independence. For example, the Chicago Housing Authority’s FSS Program shows the impact public housing authorities can achieve if they have this type of flexibility.

- **Family Self-Sufficiency – Chicago Housing Authority**

A single mother with two young boys, Veronica struggled to make ends meet until the Chicago Housing Authority’s (CHA) [Family Self-Sufficiency \(FSS\)](#) program helped her on her path to achieve her dream of becoming a nurse.

“What am I most proud of? Being able to say I’m a nurse, knowing that I just kind of beat the odds,” Veronica told CHA in a video interview featured on the agency’s website. “A lot of people, they look down on people with housing assistance, and



there's like this stereotype. And I want to break that. I don't want to be a part of that. I want to show people that the stereotype is absolutely not true.”

CHA's FSS program helped Veronica obtain affordable childcare and explore financial aid options to go back to school for nursing.

Program participants can build financial assets as they work on educational, professional and personal goals during the five-year program.

Up to two adults age 18 or older from each household can participate in CHA's FSS program, which partners with Heartland Human Care Services to work directly with participants. They help participants set goals, develop a plan, identify resources to meet their goals, and increase financial stability and awareness.

CHA FSS Coordinators also mentor participants.

Program participants may be eligible to earn credits to a savings account as they achieve their personal goals. Those who graduate from the program can receive the funds in their account, historically about \$6,000 on average per participant.

Local Housing Choice Voucher Payment Standards

The Section 8 Housing Choice Voucher payment standard is the maximum subsidy amount that a housing authority will pay for an apartment or rental house, minus the applicable portion of the rent that a tenant pays. The payment standard is based on the number of bedrooms approved for the family's size. Historically, payment standards have been based on the Fair Market Rent (FMR) for a metropolitan area, as determined by HUD.

MTW agencies have pioneered alternative approaches to setting payment standards, using flexibility to increase standards in high-cost areas and control costs in more affordable markets within a metropolitan area. Setting higher payment standards for areas where housing costs typically are higher provides Section 8 Housing Choice Voucher participants more flexibility to choose to live in neighborhoods that offer more opportunities for transportation, schools and employment. More than one-third of MTW agencies have adopted local voucher payment standards. In recent years, HUD has established Small Area FMRs to allow for adjustments at the ZIP Code level. However, public housing authorities require broader flexibilities to utilize their own data and analysis to set local payment standards that more accurately reflect the circumstances in their communities and more effectively assist the households they serve.

- **Seattle Housing Authority and King County Housing Authority**

Seattle Housing Authority (SHA) and King County Housing Authority (KCHA) have taken different approaches to setting payment standards in their neighboring jurisdictions, yet found them to be equally valuable in the implementation of their groundbreaking Creating Moves to Opportunity ([CMTO](#)) demonstration.

KCHA began using its MTW flexibility to create local payment standards in 2008 to provide higher subsidies for households in more costly areas of King County. In 2016, the agency fully realized this strategy by introducing a ZIP Code-based payment standard system that now groups ZIP Codes into six tiers. This system allows the payment standards to cover the full range of rental markets across 37 suburban and rural jurisdictions. The approach considers a range of local factors, including recent tenant lease-up records, local real estate market data, feedback from staff and residents, and the financial implications of various approaches.

In 2016, SHA designed its system to control program costs in units receiving other funding sources, such as Low-Income Housing Tax Credits, and to enable SHA to maximize payment standards in market-rate units. This approach ensures that SHA has the resources to fund payment standards that are sufficient for voucher participants to successfully lease in Seattle's skyrocketing rental market. Like KCHA, SHA has also recognized the significant variation in rents within its jurisdiction and created a targeted program, the Family Access Supplement. This supplement provides a higher voucher payment standard to families with children to increase access to rental units in [evidence-based](#), high-opportunity areas.

SHA and KCHA's innovative payment standard systems have been a critical component of the CMTO program, a mobility demonstration completed in partnership with leading national researchers. Higher local payment standards help families enrolled in the CMTO program access high-opportunity areas, which are almost always more costly than the balance of the region. When coupled with CMTO's housing navigation and financial resources, the local payment standards allow the agencies to achieve [positive outcomes](#).

KCHA combined this approach to mobility with the purchase or development of more than 5,000 additional units of housing in high-opportunity neighborhoods and along emerging high-capacity transit corridors. In some cases, KCHA brought additional affordability to these units through public housing subsidies. This supply of workforce housing provides an affordable option for tenant-based voucher holders in high-cost markets. Roughly 16 percent of KCHA's workforce housing is occupied by households using tenant-based vouchers. Approximately 30 percent of KCHA's extremely low-income households with children supported through the Public Housing and Housing Choice Voucher Programs live in high-opportunity neighborhoods.

Income Verification

Verifying a federal rental assistance household's income is essential to determining the correct amount they will pay toward their rent. This ensures the family does not pay more or less than the program requires.

Section 8 Housing Choice Voucher participants pay a predetermined amount of the rent based on their income, and the public housing authority pays the remainder of the rent, up to the applicable payment standard.

To verify household income, HUD requires public housing authorities to use HUD's Enterprise Income Verification Income Report, which includes employment and income information for the family. If that information is not in the report, HUD requires public housing authorities to utilize other verification processes in a specific order.

Permanently allowing public housing authorities to deviate from HUD's specific order of income verification processes will enhance program efficiency. In addition, all sources of income should be considered equal for income verification purposes.

The Chicago Housing Authority, Louisville Metro Housing Authority, San Antonio Housing Authority and Seattle Housing Authority are examples of MTW agencies that implemented alternative income verification in response to COVID-19. Examples of their alternative methods are: waiving the use of HUD's Enterprise Income Verification Income Report; extending the time frame that income verification is valid; treating all sources of income equally; and allowing for self-certification of income.

How frequently public housing authorities require rental assistance households to reverify their income affects the administrative burden on both the households and the housing authorities. Extending the period of time that the verification of income remains valid will result in administrative efficiencies and cost savings.

In addition, some public housing authorities allow rental assistance program participants to self-certify their income by signing documents in person. To provide participants and public housing authorities more flexibility and efficiency, public housing authorities should be allowed to accept self-certification of income by phone, email or electronic signature software instead of in-person signatures.

Changes in Household Income between Regular Recertification

Public housing authorities schedule regular recertification of a rental assistance household's income, annually or every two years. However, a rental assistance household may lose income before their next regularly scheduled income recertification. If this occurs, the household can ask their public housing authority to perform an "interim" recertification. This can result in a reduction in the amount they pay toward their rent and an increase in the amount of rental assistance they receive until they restore the income amount they lost. The timing, duration and cause of income loss can vary. Public housing authorities may limit the number of times a household can request an interim recertification of their income.

MTW agencies have used their flexibility to adopt locally based policies regarding how often a family can request an adjustment to their rental assistance because of a change in income before their regular recertification date. Providing all public housing authorities the same ability to

make this decision will streamline the interim income recertification process. Each agency will be able to determine the frequency of interim income recertification based on the needs of their residents and local conditions. This has been especially important during the COVID-19 pandemic, as households with low income experience financial hardship from lost hours or layoffs and other impacts of COVID-19. During the COVID-19 pandemic, MTW agencies such as the Cambridge Housing Authority, Keene Housing, and Home Forward (Housing Authority of Portland) have used this flexibility to expedite interim recertifications and help provide rent relief to residents.

Housing Assistance Payment (HAP) Contract Payment Period

The federal Section 8 Housing Choice Voucher program provides rental assistance through a Housing Assistance Payment (HAP) contract between the public housing authority and a landlord. Through this contract, the public housing authority pays a portion of the contract rent directly to the landlord on behalf of the rental assistance family. The participating family is able to search for and locate a rental housing unit that meets their needs, and then the public housing authority enters into the contract with the identified landlord. Currently, 60 days is the standard amount of time for a public housing authority to enter into the HAP contract. However, in areas with high rental housing costs and competitive rental markets with low vacancy rates, rental assistance families may need more time to locate a rental housing unit.

During the COVID-19 pandemic, HUD has allowed public housing authorities to have more than 60 days to enter into the HAP contract, if they can pay the expense with funding sources that are not federal. This may help rental assistance families secure safe, decent and affordable housing and provide an incentive to recruit and maintain landlord participation. Permanently extending this flexibility to public housing authorities will further enhance the housing options available for families with low income relying on rental assistance.

Federal Housing Quality Standards Inspections

Public housing authorities are required to ensure that all housing units occupied by Section 8 Housing Choice Voucher rental assistance participants meet certain health and safety standards. HUD sets these “Housing Quality Standards” (HQS). Rental housing units must pass an HQS inspection before the public housing authority can enter into a contract and issue rental assistance payments for the household.

MTW agencies pioneered streamlined HQS inspections for the federal rental assistance program, including scheduling inspections every two years (biennial) instead of annually. This practice has been expanded to all public housing authorities through the 2016 Housing Opportunities Through Modernization Act (HOTMA). In addition, during the COVID-19 pandemic, public housing authorities have implemented alternative HQS inspection procedures, such as performing inspections remotely by video, if the unit is empty. Public housing authorities that have

implemented this type of remote virtual inspection report that residents and landlords are supportive.

In addition, allowing residents and landlords to self-certify that the rental housing unit fulfills HQS would create additional efficiency and cost savings for public housing authorities. With this type of self-certification, both the resident and the landlord can be required to certify the condition of the housing unit. This practice also has been implemented effectively in response to the COVID-19 pandemic, demonstrating its potential for continued use into the future.

The Chicago Housing Authority and San Antonio Housing Authority are among the MTW agencies that have implemented virtual inspections. The Housing Authority of the County of San Bernardino and the San Diego Housing Commission allow self-certification by both the landlord and tenant during the COVID-19 pandemic, while the Oakland Housing Authority, King County Housing Authority, Seattle Housing Authority and Home Forward (the Housing Authority of Portland) allow landlords to self-certify the condition of the properties in certain circumstances until the COVID-19 public health emergency ends. In addition, the Lawrence-Douglas County Housing Authority in Kansas uses MTW flexibility to allow landlords to self-certify corrections at the housing authority's discretion and in cases where the issues are minor, not life threatening and not safety hazards.

Family Unification Program Eligibility

The Family Unification Program provides federal rental assistance to families for whom the lack of housing is the primary factor in the separation of children from their families, or who are at imminent risk of such separation; families for whom the discharge of children from out-of-home care is delayed because of a lack of housing; and youths between the ages of 18 and 24 who have left or will leave foster care within 90 days and are experiencing homelessness or are at risk homelessness.

Permanently expanding the maximum age for eligible youth from 24 to 26 will make the program more consistent with other federal programs and provide eligible youth with more streamlined access to services. During the COVID-19 pandemic, MTW agencies such as Oakland Housing Authority and Home Forward (Housing Authority of Portland) used this waiver to provide extended services to families participating in the program.

Total Development Cost Limits

HUD established total development cost (TDC) limits to ensure that public housing funds were used efficiently for the construction and rehabilitation of public housing. However, in many metropolitan regions, HUD's current TDC limits do not accurately reflect the rising development and construction costs associated with building and preserving public housing.

As the affordable housing crisis grows nationwide, MTW agencies have implemented creative and innovative ways to finance affordable housing developments. These include creating a new TDC calculation specific to local construction costs and market conditions.

During the COVID-19 pandemic, HUD has allowed all public housing authorities to exceed the standard TDC by 20 percent without HUD approval for any units developed or acquired in response to COVID-19. Permanently extending this flexibility to all public housing authorities would provide public housing authorities the essential ability to finance, acquire and develop affordable housing based on the accurate, actual development costs in their specific communities. With this type of flexibility, public housing authorities can achieve results like Elm City Communities/Housing Authority of New Haven.

- **Local TDC Limits – Elm City Communities/Housing Authority of New Haven (Connecticut)**

Increased housing quality, more marketable units, reduced maintenance costs, and enhanced housing choice and quality of life for residents are among the benefits Elm City Communities/Housing Authority of New Haven (ECC/HANH) has experienced by using TDCs that reflect local construction costs.

ECC/HANH determined that HUD's standard TDC and housing construction costs (HCC) limits do not reflect the local marketplace conditions for development and redevelopment activities for New Haven, which is close to the New York City construction market and is higher than the national average.

ECC/HANH establishes TDC and HCC separate from HUD's standard limits to better reflect local real estate market conditions.

In its 2019 MTW Annual Report, ECC/HANH identified 14 recent developments, of which eight used the local TDC, ranging from approximately \$180,000 per unit to \$380,000 per unit. When the local TDC exceeded HUD TDC limits, the difference ranged from \$4,700 to \$78,000. ECC/HANH never exceeded HUD's approved alternate TDC limits.

TOTAL DEVELOPMENT COST BY DEVELOPMENT AND UNIT										
Development Name	Year Converted	LIPH Units	PBV Units	Total # of Assisted Units	# of Market Rate Units	Total # of Units	HUD TDC (2013) ~	ECC HANH TDC ~	TDC	TDC Per Unit
Eastview Terrace Phase I	2009	53	49	102	0	102	\$259,210	\$351,621	\$32,289,891	\$316,567.56
Quinnipiac Terrace 3	2010	17	16	33	0	33	\$259,210	\$351,621	\$9,384,480	\$284,378.18
William T. Rowe	2010	46	32	78	26	104	\$313,133	\$428,328	\$24,987,375	\$240,263.22
Brookside Phase I	2011	50	50	100	0	100	\$259,210	\$351,621	\$30,198,639	\$301,986.39
Brookside Phase II	2012	50	51	101	0	101	\$259,210	\$351,621	\$20,014,054	\$198,158.95
Wilmot Crossing	2012	0	47	47	0	47	\$313,133	\$428,328	\$13,109,292	\$278,921.11
Rockview Phase I	2013	30	47	77	0	77	\$259,210	\$351,621	\$21,790,445	\$282,992.79
Ribicoff 9%	2014	0	44	44	11	55	\$313,133	\$428,328	\$14,517,329	\$263,951.44
Ribicoff 4%	2014	0	51	51	0	51	\$259,210	\$351,621	\$13,457,150	\$263,865.69
Farnam Courts-Fair Haven	2015	0	57	57	0	57	\$259,210	\$351,621	\$19,203,991	\$336,912.12
Farnam Court Phase I onsite	2016	0	86	86	8	94	\$313,133	\$428,328	\$27,436,148	\$291,873.91
Rockview Phase 2**	2019	0	62	62	16	78	\$298,901	\$405,464	\$22,736,473	\$291,493.24
Farnam Courts-Phase 2*	2020	0	88	88	23	111	\$259,210	\$351,621	\$33,394,964	\$300,855.53
Westville Manor*	TBD	0	87	87	22	109	\$313,133	\$405,464	\$41,420,000	\$380,000.00
Total		360	856	1216	45	1261				

*- Proposed, ** Under Construction, ~2013 TDC used for 3-bedroom

Higher TDC limits to construct high-quality housing does not require more MTW assistance. ECC/HANH has demonstrated its ability to leverage non-MTW funds as much as possible.

CONCLUSION

Public housing authorities are uniquely positioned to best understand the housing needs in their communities and the solutions to address them within the context of federal oversight. Providing local agencies the flexibility to identify and implement the most effective housing program options for their customers is essential as they continue to serve families with low income.

The MTW program has demonstrated the effectiveness of this approach for more than 20 years.

In addition, HUD and public housing authorities nationwide have shown the ability to continue to effectively assist families while previous requirements and regulations are suspended and adjusted.

Extending MTW flexibility and the regulatory waivers and changes detailed in this report to all public housing authorities will maximize the impact of federal resources, continue to meet the needs of households in federal housing programs; and provide opportunities to achieve more financial self-reliance for those who are able.

APPENDIX

**Summary of Public Housing and Section 8 Housing Choice Voucher Waivers and Alternative Requirements
(Refer to Notice PIH 2020-33(HA), REV-2 using the item code for a full description and more detailed information.)**

This chart summarizes the waivers authorized under this Notice and the availability period for each. As stated in Section 5, Public Housing Authorities (PHAs) must keep written documentation on the waivers applied by the PHA as well as the effective dates. To fulfill those requirements, PHAs may but are not required to utilize the last two columns to record this information.

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
PH and HCV-1 PHA 5-Year and Annual Plan Submission Dates: Significant Amendment Requirements	<u>Statutory Authority</u> Section 5A(a)(1), Section 5A(b)(1), Section 5A(g), Section 5A(h)(2) <u>Regulatory Authority</u> §§ 903.5(a)(3), 903.5(b)(3), 903.13(c), 903.21, 903.23	<ul style="list-style-type: none"> Alternative dates for submission Changes to significant amendment process 	<ul style="list-style-type: none"> Varies based on FYE 12/31/20 		
PH and HCV-2 Family Income and Composition: Delayed Annual Examinations	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> §§ 982.516(a)(1), 960.257(a)	<ul style="list-style-type: none"> Permits the PHA to delay the annual reexamination of income and family composition HCV PHAs must implement HCV-7 for impacted families if they implement this waiver 	<ul style="list-style-type: none"> 6/30/21 All reexams due in CY20 must be completed by 12/31/20. Reexams due between 1/1/21 and 6/30/21 would need to be completed by 6/30/21.		

**Summary of Public Housing and Section 8 Housing Choice Voucher Waivers and Alternative Requirements
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Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
PH and HCV-3 Family Income and Composition: Annual Examination; Income Verification Requirements	<u>Regulatory Authority</u> §§ 5.233(a)(2), 960.259(c), 982.516(a) <u>Sub-regulatory Guidance</u> Notice PIH 2018-18	<ul style="list-style-type: none"> • Waives the requirements to use the income hierarchy, including the use of EIV, and will allow PHAs to consider self-certification as the highest form of income verification • PHAs that implement this waiver will be responsible for addressing material income discrepancies that may arise later 	<ul style="list-style-type: none"> • 6/30/21 		
PH and HCV-4 Family Income and Composition: Interim Examinations	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> §§ 5.233(a)(2), 982.516(c)(2), 960.257(a), (b) and (d), 960.259(c) <u>Sub-regulatory Guidance</u> Notice PIH 2018-18	<ul style="list-style-type: none"> • Waives the requirement to use the income verification requirements, including the use of EIV, for interim reexaminations 	<ul style="list-style-type: none"> • 6/30/21 		

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Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
PH and HCV-5 Enterprise Income Verification (EIV) Monitoring	<u>Regulatory Authority</u> § 5.233 <u>Sub-regulatory Guidance</u> Notice PIH 2018-18	<ul style="list-style-type: none"> • Waives the mandatory EIV monitoring requirements 	<ul style="list-style-type: none"> • 6/30/21 		
PH and HCV-6 Family Self-Sufficiency (FSS) Contract of Participation: Contract Extension	<u>Regulatory Authority</u> § 984.303(d)	<ul style="list-style-type: none"> • Provides for extensions to FSS contract of participation 	<ul style="list-style-type: none"> • 6/30/21 		
PH and HCV-7 Waiting List: Opening and Closing; Public Notice	<u>Regulatory Authority</u> § 982.206(a)(2) <u>Sub-regulatory Guidance</u> Notice PIH 2012-34	<ul style="list-style-type: none"> • Waives public notice requirements for opening and closing waiting list • Requires alternative process 	<ul style="list-style-type: none"> • 6/30/21 		
HQS-1 Initial Inspection Requirements	<u>Statutory Authority</u> Section 8(o)(8)(A)(i), Section 8(o)(8)(C) <u>Regulatory Authority</u> §§ 982.305(a), 982.305(b),	<ul style="list-style-type: none"> • Changes initial inspection requirements, allowing for owner certification that there are no life-threatening deficiencies • Where self-certification was used, PHA must 	<ul style="list-style-type: none"> • 6/30/21 • 1-year anniversary of 		

**Summary of Public Housing and Section 8 Housing Choice Voucher Waivers and Alternative Requirements
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Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
	982.405	<p>inspect the unit no later than 1-year anniversary of date of owner's certification</p> <ul style="list-style-type: none"> Will include reminder that HQS waiver does not include a waiver of 24 CFR 35.15, visual assessment for deteriorated paint 	date of owner's certification		
HQS-2: Project-Based Voucher (PBV) Pre-HAP Contract Inspections: PHA Acceptance of Completed Units	<p><u>Statutory Authority:</u> Section 8(o)(8)(A)</p> <p><u>Regulatory Authority:</u> §§ 983.103(b), 983.156(a)(1)</p>	<ul style="list-style-type: none"> Changes inspection requirements, allowing for owner certification that there are no life-threatening deficiencies Where self-certification was used, PHA must inspect the unit no later than 1-year anniversary of date of owner's certification 	<ul style="list-style-type: none"> 6/30/21 1-year anniversary of date of owner's certification 		
HQS-3 Initial Inspection: Non-Life-Threatening Deficiencies (NLT) Option	<p><u>Statutory Authority</u> Section 8(o)(8)(A)(ii)</p> <p><u>Sub-regulatory Guidance</u></p>	<ul style="list-style-type: none"> Allows for extension of up to 30 days for owner repairs of non-life threatening conditions 	<ul style="list-style-type: none"> 6/30/21 		

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Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
	HOTMA HCV Federal Register Notice January 18, 2017				
HQS-4 HQS Initial Inspection Requirement: Alternative Inspection Option	<u>Statutory Authority</u> Section 8(o)(8)(A)(iii) <u>Sub-regulatory Guidance</u> HOTMA HCV Federal Register Notice January 18, 2017	<ul style="list-style-type: none"> Under Initial HQS Alternative Inspection Option - allows for commencement of assistance payments based on owner certification there are no life-threatening deficiencies Where self-certification was used, PHA must inspect the unit no later than 1-year anniversary of date of owner's certification 	<ul style="list-style-type: none"> 6/30/21 1-year anniversary of date of owner's certification 		
HQS-5 HQS Inspection Requirement: Biennial Inspections	<u>Statutory Authority</u> Section 8(o)(D) <u>Regulatory Authority</u> §§ 982.405(a), 983.103(d)	<ul style="list-style-type: none"> Allows for delay in biennial inspections PHAs must require owner certification there are no life-threatening deficiencies 	<ul style="list-style-type: none"> 6/30/21 12/31/21 		

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Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
		<ul style="list-style-type: none"> All delayed biennial inspections must resume by 6/30/21 and be completed by 12/31/21 			
HQS-6 HQS Interim Inspections	<u>Statutory Authority</u> Section 8(o)(8)(F) <u>Regulatory Authority</u> §§ 982.405(g), 983.103(e)	<ul style="list-style-type: none"> Waives the requirement for the PHA to conduct interim inspection and requires alternative method Allows for repairs to be verified by alternative methods 	<ul style="list-style-type: none"> 6/30/21 		
HQS-7 PBV Turnover Unit Inspections	<u>Regulatory Authority</u> § 983.103(c)	<ul style="list-style-type: none"> Allows PBV turnover units to be filled based on owner certification there are no life-threatening deficiencies Allows for delayed full HQS inspection NLT than 1-year anniversary of date of owner's certification 	<ul style="list-style-type: none"> 6/30/21 1-year anniversary of date of owner's certification 		
HQS-8: PBV HAP Contract: HQS	<u>Statutory Authority</u> Section 8(o)(8)(A)	<ul style="list-style-type: none"> Allows for PBV units to be added or substituted in the HAP contract 	<ul style="list-style-type: none"> 6/30/21 		

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Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
Inspections to Add or Substitute Units	<u>Regulatory Authority</u> §§ 983.207(a), 983.207(b) <u>Sub-regulatory Guidance</u> HOTMA HCV Federal Register Notice January 18, 2017	based on owner certification there are no life-threatening deficiencies <ul style="list-style-type: none"> Allows for delayed full HQS inspection NLT 1-year anniversary of date of owner's certification 	<ul style="list-style-type: none"> 1-year anniversary of date of owner's certification 		
HQS-9 HQS Quality Control Inspections	<u>Regulatory Authority</u> §§ 982.405(b), 983.103(e)(3)	<ul style="list-style-type: none"> Provides for a suspension of the requirement for QC sampling inspections 	<ul style="list-style-type: none"> 6/30/21 		
HQS-10 Housing Quality Standards: Space and Security	<u>Regulatory Authority</u> § 982.401(d)	<ul style="list-style-type: none"> Waives the requirement that each dwelling unit have at least 1 bedroom or living/sleeping room for each 2 persons. 	Remains in effect one year from lease term or date of this Notice, whichever is longer		

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Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
HQS-11 Homeownership Option: Initial HQS Inspection	<u>Statutory Authority</u> Section 8(o)(8)(A)(i), Section 8(y)(3)(B) <u>Regulatory Authority</u> § 982.631(a)	<ul style="list-style-type: none"> • Waives the requirement to perform an initial HQS inspection in order to begin making homeownership assistance payments • Requires family to obtain independent professional inspection 	<ul style="list-style-type: none"> • 6/30/21 		
HCV-1 Administrative Plan	<u>Regulatory Authority</u> § 982.54(a)	<ul style="list-style-type: none"> • Establishes an alternative requirement that policies may be adopted without board approval until 3/31/21 • Any provisions adopted informally must be adopted formally by 6/30/21 	<ul style="list-style-type: none"> • 3/31/21 • 6/30/21 		
HCV-2 Information When Family is Selected: PHA Oral Briefing	<u>Regulatory Authority</u> §§ 982.301(a)(1), 983.252(a)	<ul style="list-style-type: none"> • Waives the requirement for an oral briefing • Provides for alternative methods to conduct required voucher briefing 	<ul style="list-style-type: none"> • 6/30/21 		

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Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
HCV-3 Term of Voucher: Extensions of Term	<u>Regulatory Authority</u> § 982.303(b)(1)	<ul style="list-style-type: none"> Allows PHAs to provide voucher extensions regardless of current PHA policy 	• 6/30/21		
HCV-4 PHA Approval of Assisted Tenancy: When HAP Contract is Executed	<u>Regulatory Authority</u> § 982.305(c)	<ul style="list-style-type: none"> Provides for HAP payments for contracts not executed within 60 days PHA must not pay HAP to owner until HAP contract is executed 	• 6/30/21		
HCV-5 Absence from Unit	<u>Regulatory Authority</u> § 982.312	<ul style="list-style-type: none"> Allows for PHA discretion on absences from units longer than 180 days PHAs must not make HAP payments beyond 12/31/20 for units vacant more than 180 consecutive days 	• 6/30/21		

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Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
HCV-6 Automatic Termination of HAP Contract	<u>Regulatory Authority</u> § 982.455	<ul style="list-style-type: none"> Allows PHA to extend the period of time after the last HAP payment is made before the HAP contract terminates automatically. 	<ul style="list-style-type: none"> 6/30/21 		
HCV-7 Increase in Payment Standard During HAP Contract Term	<u>Regulatory Authority</u> § 982.505(c)(4)	<ul style="list-style-type: none"> Provides PHAs with the option to increase the payment standard for the family at any time after the effective date of the increase, rather than waiting for the next regular reexamination. 	<ul style="list-style-type: none"> 6/30/21 		
HCV-8 Utility Allowance Schedule: Required Review and Revision	<u>Regulatory Authority</u> § 982.517	<ul style="list-style-type: none"> Provides for delay in updating utility allowance schedule 	<ul style="list-style-type: none"> 6/30/21 		
HCV-9 Homeownership Option: Homeownership Counseling	<u>Statutory Authority</u> Section 8(y)(1)(D) <u>Regulatory Authority</u> §§ 982.630, 982.636(d)	<ul style="list-style-type: none"> Waives the requirement for the family to obtain pre-assistance counseling 	<ul style="list-style-type: none"> 6/30/21 		

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Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
HCV-10 Family Unification Program (FUP): FUP Youth Age Eligibility to Enter HAP Contract	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> Allows PHAs to increase age to 26 for foster youth initial lease up 	<ul style="list-style-type: none"> 6/30/21 		
HCV-11 Family Unification Program (FUP): Length of Assistance for Youth	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> Allows PHAs to suspend terminations of assistance for FUP youth who will reach the 36-month limit between April 10, 2020, and December 31, 2020 	<ul style="list-style-type: none"> 6/30/21 		
HCV-12 Family Unification Program (FUP): Timeframe for Referral	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> Allows PHAs to accept referrals of otherwise eligible youth who will leave foster care within 120 days 	<ul style="list-style-type: none"> 6/30/21 		
HCV-13 Homeownership: Maximum Term of Assistance	<u>Regulatory Authority</u> § 982.634(a)	<ul style="list-style-type: none"> Allows a PHA to extend homeownership assistance for up to 1 additional year 	<ul style="list-style-type: none"> 6/30/21 		

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Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
HCV-14 Mandatory Removal of Unit from PBV HAP Contract	<u>Regulatory Authority</u> §§ 983.211(a); 983.258	<ul style="list-style-type: none"> Allows a PHA to keep a PBV unit under contract for a period of time that extends beyond 180 from the last HAP but does not extend beyond December 31, 2020 	<ul style="list-style-type: none"> 6/30/21 		
PH-1 Fiscal Closeout of Capital Grant Funds	<u>Regulatory Authority</u> § 905.322(b)	<ul style="list-style-type: none"> Extension of deadlines for ADCC and AMCC 	Varies by PHA		
PH-2 Total Development Costs	<u>Regulatory Authority</u> § 905.314(c) - (d)	<ul style="list-style-type: none"> Waives the TDC and HCC limits permitting approval of amounts in excess of published TDC by 25% to 50% on a case by case basis 	Applies to development proposals submitted to HUD no later than December 31, 2021		
PH-3 Cost and Other Limitations: Types of Labor	<u>Regulatory Authority</u> § 905.314(j)	<ul style="list-style-type: none"> Allows for the use of force account labor for modernization activities in certain circumstances 	<ul style="list-style-type: none"> 6/30/21 		

**Summary of Public Housing and Section 8 Housing Choice Voucher Waivers and Alternative Requirements
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Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
PH-4 ACOP: Adoption of Tenant Selection Policies	<u>Regulatory Authority</u> § 960.202(c)(1)	<ul style="list-style-type: none"> Establishes an alternative requirement that policies may be adopted without board approval until 3/31/21 Any provisions adopted informally must be adopted formally by 6/30/21 	<ul style="list-style-type: none"> 3/31/21 6/30/21 		
PH-5 Community Service and Self-Sufficiency Requirement (CSSR)	<u>Statutory Authority</u> Section 12(c) <u>Regulatory Authority</u> §§ 960.603(a) and 960.603(b)	<ul style="list-style-type: none"> Temporarily suspends CSSR 	<ul style="list-style-type: none"> 6/30/21 		
PH-6 Energy Audits	<u>Regulatory Authority</u> § 965.302	<ul style="list-style-type: none"> Allows for delay in due dates of energy audits 	<ul style="list-style-type: none"> 12/31/21 		

**Summary of Public Housing and Section 8 Housing Choice Voucher Waivers and Alternative Requirements
(Refer to Notice PIH 2020-33(HA), REV-2 using the item code for a full description and more detailed information.)**

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
PH-7 Over-Income Families	<u>Statutory Authority</u> Section 16(a)(5) <u>Sub-regulatory Guidance</u> Housing Opportunity Through Modernization Act of 2016: Final Implementation of the Public Housing Income Limit 83 FR 35490, Notice PIH 2019-11	<ul style="list-style-type: none"> Changes to timeframes for determination of over-income when a delay in the annual reexamination occurs as a result of adoption of waiver PH and HCV-2 	<ul style="list-style-type: none"> 6/30/21 		
PH-8 Resident Council Elections	<u>Regulatory Authority</u> § 964.130(a)(1)	<ul style="list-style-type: none"> Provides for delay in resident council elections 	<ul style="list-style-type: none"> 6/30/21 		
PH-9 Review and Revision of Utility Allowance	<u>Regulatory Authority</u> § 965.507	<ul style="list-style-type: none"> Provides for delay in updating utility allowance schedule 	<ul style="list-style-type: none"> 6/30/21 		
PH-10 Tenant Notifications for Changes to Project Rules and Regulations	<u>Regulatory Authority</u> § 966.5	<ul style="list-style-type: none"> Advance notice not required except for policies related to tenant charges 	<ul style="list-style-type: none"> 6/30/21 		

**Summary of Public Housing and Section 8 Housing Choice Voucher Waivers and Alternative Requirements
(Refer to Notice PIH 2020-33(HA), REV-2 using the item code for a full description and more detailed information.)**

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
PH-11 Designated Housing Plan Renewals	<u>Statutory Authority</u> Section 7(f)	<ul style="list-style-type: none"> Extends the Plan's effective period through June 30, 2021 for Plans due to expire between July 2, 2020 and June 30, 2021 	<ul style="list-style-type: none"> 6/30/21 		
PH-12 Public Housing Agency Annual Self-Inspections	<u>Statutory Authority</u> Section 6(f)(3) <u>Regulatory Authority</u> § 902.20(d)	<ul style="list-style-type: none"> Waives the requirement that the PHA must inspect each project 	<ul style="list-style-type: none"> 12/31/20 		
PH-13 Over-Income Limit: Termination Requirement	<u>Statutory Authority</u> Section 16(a) as amended by section 103 of HOTMA Implementation Notice: Housing Opportunity Through Modernization Act of 2016: Final Implementation of Public Housing Income Limit, 83 Fed. Reg. 35,490 (July 26, 2018)	<ul style="list-style-type: none"> Waives the requirement that a family whose income has exceeded the over-income limit for the locality for two consecutive years be terminated within 6 months of the third income determination. As an alternative requirement, over-income families will remain public housing households instead of being terminated and 	<ul style="list-style-type: none"> 6/30/21 		

**Summary of Public Housing and Section 8 Housing Choice Voucher Waivers and Alternative Requirements
(Refer to Notice PIH 2020-33(HA), REV-2 using the item code for a full description and more detailed information.)**

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
		will be charged the applicable FMR as the family's monthly rental amount.			
PH-14 Annual Choice of Rent	<u>Statutory Authority:</u> 42 USC 1437a(a)(2)(A) <u>Regulatory Authority</u> § 960.253	<ul style="list-style-type: none"> Allows families an additional opportunity to select an income-based or flat rent 	<ul style="list-style-type: none"> 6/30/21 		
11a PHAS	<u>Regulatory Authority</u> 24 CFR Part 902	<ul style="list-style-type: none"> Allows for alternatives related to inspections PHA to retain prior year PHAS score unless requests otherwise 	HUD will resume issuing new PHAS scores starting with PHAs with FYE dates of 6/30/21		
11b SEMAP	<u>Regulatory Authority</u> 24 CFR Part 985	<ul style="list-style-type: none"> PHA to retain prior year SEMAP score unless requests otherwise 	HUD will resume issuing new SEMAP scores starting with PHAs with FYE dates of 06/30/21		
11b-1 SEMAP	<u>Regulatory Authority</u> § 985.105(d)	<ul style="list-style-type: none"> Allows field offices to perform a remote SEMAP confirmatory review instead of an on- 	<ul style="list-style-type: none"> 6/30/21 		

**Summary of Public Housing and Section 8 Housing Choice Voucher Waivers and Alternative Requirements
(Refer to Notice PIH 2020-33(HA), REV-2 using the item code for a full description and more detailed information.)**

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
		site confirmatory review before changing a PHA's rating from troubled to standard or high performer			
11b-2 SEMAP	<u>Regulatory Authority</u> § 985.101(a)	<ul style="list-style-type: none"> • Waives the requirement for PHAs to submit an annual SEMAP certification in PIC within 60 days of FYE during the period of time that HUD will roll forward prior year SEMAP scores 	<ul style="list-style-type: none"> • 6/30/21 		
11c Uniform Financial Reporting Standards: Filing of Financial Reports; Reporting Compliance Dates	<u>Regulatory Authority</u> §§ 5.801(c), 5.801(d)(1)	<ul style="list-style-type: none"> • Allows for extensions of financial reporting deadlines 	Varies by PHA FYE		
12a PHA Reporting Requirements on HUD Form 50058	<u>Regulatory Authority</u> 24 CFR Part 908, § 982.158	<ul style="list-style-type: none"> • Waives the requirement to submit 50058 within 60 days • Alternative requirement to submit within 90 days 	<ul style="list-style-type: none"> • 12/31/20 		

**Summary of Public Housing and Section 8 Housing Choice Voucher Waivers and Alternative Requirements
(Refer to Notice PIH 2020-33(HA), REV-2 using the item code for a full description and more detailed information.)**

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
	<u>Sub-regulatory Guidance</u> Notice PIH 2011-65	of the effective date of action			
12b Designated Housing Plans: HUD 60-Day Notification	<u>Statutory Authority</u> Section 7(e)(1)	<ul style="list-style-type: none"> Allows for HUD to delay notification about designated housing plan 	<ul style="list-style-type: none"> 7/31/20 		
12c Extension of Deadline for Programmatic Obligation and Expenditure of Capital Funds	<u>Statutory Authority</u> Section 9(j) <u>Regulatory Authority</u> § 905.306(d)(5)	<ul style="list-style-type: none"> Provides an 18-month extension 	For all open Capital Fund grants, an 18-month extension from the obligation and expenditure end dates in LOCCS as of April 10, 2020		
12d Section 6(j) 1- and 2-Year Substantial Improvement Requirements	<u>Statutory Authority</u> Section 6(j)(3)(B)(ii) <u>Regulatory Authority</u> 24 CFR § 902.75(d)	<ul style="list-style-type: none"> For PHAs designated as troubled prior to the date of this Notice that have not received a PHAS assessment for the first full fiscal year after the initial notice of the troubled designation, HUD will: (1) evaluate the 1-year substantial improvement 	The period of availability for this waiver and alternative requirement: (1) is effective on the date of this Notice; and, (2) will continue through June 30, 2023, at which time HUD		

**Summary of Public Housing and Section 8 Housing Choice Voucher Waivers and Alternative Requirements
(Refer to Notice PIH 2020-33(HA), REV-2 using the item code for a full description and more detailed information.)**

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
		benchmark based on the first released score for fiscal years ending on or after June 30, 2022; and, (2) toll the evaluation of the 2-year recovery benchmark to the next sequential fiscal year	will reevaluate any additional impacts of this waiver on any PHA in the process of being evaluated.		
MR-1 Family Income and Composition: Delayed Annual Examination	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> 24 CFR § 882.515(a)	<ul style="list-style-type: none"> • Waives statutory and regulatory requirement to permit PHAs to delay annual reexaminations of Mod Rehab families 	<ul style="list-style-type: none"> • 6/30/21 		
MR-0 Family Income and Composition: Annual examination; Income Verification Requirements	<u>Regulatory Authority:</u> §5.233(a)(2) <u>Sub-regulatory Guidance</u> Notice PIH 2018-18	<ul style="list-style-type: none"> • Waives the requirements to use the income hierarchy described by Notice PIH 2018-18 and will allow PHAs to forgo third-party income verification requirements for annual reexaminations, including the use of EIV, if the PHA wishes to conduct 	<ul style="list-style-type: none"> • 6/30/21 		

**Summary of Public Housing and Section 8 Housing Choice Voucher Waivers and Alternative Requirements
(Refer to Notice PIH 2020-33(HA), REV-2 using the item code for a full description and more detailed information.)**

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
		the annual reexam rather than delaying the family's annual reexam as permitted under MR-1			
MR-3 Family Income and Composition: Interim Examinations	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> 24 CFR §§ 5.233(a)(2), 882.515(b) <u>Sub-regulatory Guidance</u> Notice PIH 2018-18	<ul style="list-style-type: none"> • Waives requirements to use the income verification hierarchy as described by Notice PIH 2018-18. Allows PHAs to forgo third-party income verification requirements for interim reexams, 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 reexams 	<ul style="list-style-type: none"> • 6/30/21 		
MR-4 Enterprise Income Verification (EIV)	<u>Regulatory Authority</u> § 5.233	<ul style="list-style-type: none"> • Waiving the mandatory EIV monitoring requirements. 	<ul style="list-style-type: none"> • 6/30/21 		

**Summary of Public Housing and Section 8 Housing Choice Voucher Waivers and Alternative Requirements
(Refer to Notice PIH 2020-33(HA), REV-2 using the item code for a full description and more detailed information.)**

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
Monitoring	<u>Sub-regulatory Guidance</u> Notice PIH 2018-18				
MR-5 PHA Inspection Requirement: Annual Inspections	<u>Regulatory Authority</u> § 882.516(b)	<ul style="list-style-type: none"> • Waives the annual inspection requirement and allows PHAs to delay annual inspections for Mod Rehab units • All delayed annual inspections must be completed as soon as reasonably possible but no later than one year after the date the annual inspection would have been required absent the waiver 	<ul style="list-style-type: none"> • 6/30/21 		
MR-6 Adjustment of Utility Allowance	<u>Regulatory Authority</u> § 882.510	<ul style="list-style-type: none"> • Waives the requirement to allow PHAs to delay the review and update of utility allowances 	<ul style="list-style-type: none"> • 6/30/21 		

**Summary of Public Housing and Section 8 Housing Choice Voucher Waivers and Alternative Requirements
(Refer to Notice PIH 2020-33(HA), REV-2 using the item code for a full description and more detailed information.)**

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
MS-1 Mainstream Initial Lease Term	<u>Statutory Authority</u> Section 8(o)(7)(A) <u>Regulatory Authority</u> § 982.309(a)(2)(ii)	<ul style="list-style-type: none"> PHA may enter initial lease terms of less than one year regardless of whether the shorter lease term is a prevailing market practice 	<ul style="list-style-type: none"> 6/30/21 		
MS-2 Mainstream Criminal Background Screening	<u>Statutory Authority</u> 42 U.S.C. 13663(a), 42 U.S.C. 13661 <u>Regulatory Authority</u> §§ CFR 5.856, 982.553(a)	<ul style="list-style-type: none"> PHAs may establish, as an alternative requirement, screening requirements for applicants for Mainstream vouchers which are distinct from those in place for its HCV program in general 	<ul style="list-style-type: none"> 6/30/21 		
MS-3 Mainstream Age Eligibility to Enter HAP Contract Statutory Authority	<u>Statutory Authority</u> 42 U.S.C. 8013(k)(2)	<ul style="list-style-type: none"> As an alternative requirement, the PHA may choose to expand the definition of an eligible non-elderly family member to include those who were issued a voucher prior 	<ul style="list-style-type: none"> 6/30/21 		

**Summary of Public Housing and Section 8 Housing Choice Voucher Waivers and Alternative Requirements
(Refer to Notice PIH 2020-33(HA), REV-2 using the item code for a full description and more detailed information.)**

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
		to turning 62 and were not yet 63 on the effective date of the HAP Contract			

Summary of IHBG and ICDBG Statutory and Regulatory Waivers and Alternative Requirements

COVID-19 Statutory and Regulatory Waivers for ONAP programs		
Item	Statutory and Regulatory Waivers	Waiver/Alternative Requirement Summary
13a. Application Process for IHBG-CARES Grants and Indian Housing Plan (IHP) Requirements	Statutory Authority: Section 101(b), Section 102, and Section 103 of NAHASDA Regulatory Authority: 24 C.F.R. §§ 1000.214; 1000.218; 1000.220; 1000.224; 1000.226; 1000.228; 1000.230; and 1000.232	<i>Abbreviated IHP to Receive IHBG-CARES Grant Funding:</i> Applicants for IHBG-CARES funding must submit an abbreviated IHP specifying how the funds will be used.
		<i>Recipients that did Not Submit an IHP in FY2020:</i> A Tribe or TDHE that did not submit a timely or compliant IHP in FY 2020 may still qualify for an IHBG-CARES grant.
		<i>IHP Certifications:</i> IHBG recipients that cannot provide HUD with IHP certifications may still submit an Abbreviated IHP provided an authorized official of the IHBG recipient provides a statement on inability to secure certifications.
		<i>Reprogramming of FY2020 IHBG Funding:</i> FY2020 IHBG funds may be reprogrammed to address COVID-19 through streamlined process.

Summary of IHBG and ICDBG Statutory and Regulatory Waivers and Alternative Requirements

13b. IHP Submission Deadline for Annual IHBG Formula Grants	Statutory Authority: Section 101(b) and 102(a) of NAHASDA, Regulatory Authority: 24 CFR §§ 1000.214, 1000.216, 1000.225	IHP Submission Deadlines Extended	Original IHP Due Date	Extension
			1/17/2020	10/16/2020
			4/17/2020	10/16/2020
			7/18/2020	1/17/2021
13c. Annual Performance Report Submission Deadline	Statutory Authority: Sections 403 and 404 of NAHASDA, Regulatory Authority: 24 CFR § 1000.514	APR Submission Deadlines Extended	Original APR Due Date	Extension
			3/30/2020	9/27/2020
			6/29/2020	12/30/2020
			9/30/2020	12/30/2020
13d. Income Verification	Regulatory Authority: 24 CFR § 1000.128	IHBG recipients may deviate from their current written admissions and occupancy policies, including allowing less frequent income recertifications, remote income verification, and self-certification over the phone or email.		
13e. Public Health Services	Statutory Authority: Section 202(3) of NAHASDA	Recipients may use IHBG-CARES funding to carry out a wide range of public health services.		

Summary of IHBG and ICDBG Statutory and Regulatory Waivers and Alternative Requirements

13f. COVID-19-Related Assistance to Non-Low Income and Non-Native Families	Statutory Authority: Section 201(b) of NAHASDA, Regulatory Authority: 24 CFR §§ 1000.104, 1000.106, 1000.108, 1000.110, 1000.312, 1000.314, 1000.318	Recipients may use IHBG-CARES funding to prevent, prepare for, and respond to COVID-19 through certain limited activities that provide assistance to all affected and threatened people without regard to income limits or Indian status.
13g. Useful Life	Statutory Authority: Section 205 of NAHASDA, Regulatory Authority: 24 CFR §§ 1000.141, 1000.142, 1000.143, 1000.144, 1000.146, 1000.147	If the assistance is related to inhibiting the spread of COVID-19 to low-income Indian families and the Tribal community, Recipients may use IHBG-CARES funding to assist housing units without determining and maintaining affordability during their useful life.
13h. Total Development Cost (TDC) Limits	Regulatory Authority: 24 CFR §§ 1000.156, 1000.158, 1000.160, 1000.162	Recipients may exceed TDC by 20 percent without HUD approval for dwelling and non-dwelling units developed, acquired or assisted to prevent, prepare for, and respond to COVID-19.
13i. Prohibition Against Investment of CARES Act Grant Funds	Statutory Authority: Section 204(b) of NAHASDA, Regulatory Authority: 24 CFR § 1000.58	Recipients are prohibited from investing any IHBG funding provided under the CARES Act.

Summary of IHBG and ICDBG Statutory and Regulatory Waivers and Alternative Requirements

13j. IHBG-CARES Funds Not Counted in Undisbursed Funds Factor	Regulatory Authority: 24 CFR § 1000.342	IHBG-CARES funds will not count towards an IHBG recipient's prior years' undisbursed funds when applying the Undisbursed Funds Factor under the IHBG formula.
14a. Citizen Participation	<p>Statutory Authority: Section 104 of the Housing and Community Development Act of 1974 (HCD Act)</p> <p>Regulatory Authority: 24 CFR § 1003.604</p>	Indian tribes are not required to hold one or more meetings to obtain the views of residents before applying for ICDBG-CARES grant funding or amending their FY 2019/2020 ICDBG grants to address COVID-19.
<p>14b. Application Process for ICDBG-CARES Grants and Funding Criteria</p> <p>Regulatory Authority: 24 CFR §§ 1003.400, 1003.401, 1003.402; Section I.A.1.b. of FY19/20 ICDBG Notice of Funding Availability (NOFA)</p>		<p><i>1) Criteria for Funding:</i> With respect to applications for ICDBG-CARES grants and FY 2019/2020 ICDBG Imminent Threat grants to address the COVID-19 crisis, the urgency and immediacy of the threat will be presumed.</p>
		<p><i>2) Grant Ceilings:</i> Current grant ceilings are waived for ICDBG-CARES and will be set in an ICDBG-CARES Implementation Notice to be published in the very near future.</p>

Summary of IHBG and ICDBG Statutory and Regulatory Waivers and Alternative Requirements

		<p>3) <i>Reimbursement of Costs and Letter to Proceed:</i> ICDBG applicants and grantees to receive ICDBG-CARES grants do not have to demonstrate other Tribal funding sources cannot be made available to alleviate the threat and may use the funding to cover or reimburse costs to prevent, prepare for, and respond to COVID-19 without a Letter to Proceed from the area ONAP.</p>
		<p>4) <i>Availability of Funds:</i> If ICDBG-CARES grant funds are not awarded in a fiscal year, HUD reserves the right to adjust how funding is awarded to ensure needs of Tribes are met, including possibly setting aside a portion of funding to address the needs of Tribes with the greatest needs.</p>
14c. Removal of Public Services 15 Percent Cap under FY 2019 and FY 2020 ICDBG Grants	Statutory Authority: Section 105 of the HCD Act; Regulatory Authority: 24 CFR § 1003.201(e); FY 19/20 ICDBG NOFA	HUD is eliminating the 15 percent cap on FY 2019/2020 ICDBG funding (both Single Purpose and Imminent Threat grants).
14d. Rental Assistance, Utility Assistance, Food, Clothing, and Other Emergency	Statutory Authority: Section 105 of the HCD Act; Regulatory Authority: 24 CFR § 1003.207(b)(4)	ICDBG grant funds may be used to provide emergency payments for low and moderate income individuals or families impacted by COVID-19 for items such as food, medicine, clothing, and other necessities, as well as utility payment assistance.

Summary of IHBG and ICDBG Statutory and Regulatory Waivers and Alternative Requirements

Assistance		
14e. Purchase of Equipment	Regulatory Authority: 24 CFR §§ 1003.207(b)(1); 1003.201(c)(1)(ii)	Grantees may use of ICDBG funds for the purchase of medical and personal protective equipment to prevent, prepare for, and respond to the COVID-19.

Summary of IHBG and ICDBG Statutory and Regulatory Waivers and Alternative Requirements

14f. Operating Expenses for Public Facilities	Regulatory Authority: 24 CFR § 1003.207(b)(2)	Grantees may use ICDBG funds to pay operating and maintenance expenses of any public facility, to the extent it is used for COVID-19-related purposes but not for staffing costs of public facilities.
14g. New Housing Construction by Tribes	Statutory Authority: Section 105 of the HCD Act, Regulatory Authority: 24 CFR § 1003.207(b)(3)	ICDBG grantees may use ICDBG funds to carry out new housing construction under certain conditions without having to use a CBDO.

MTW Agencies - Implementation of HUD Waivers



PHA	Activity Name	Type	Waiver Type	Area of Flexibility	Description	Duration	Reinstatement Possible?
Fairfax County Housing and Redevelopment Authority	HCV-1 Administrative Plan HCV-2 Information When Family is Selected: PHA Oral Briefing	HUD Waiver - PIH 2020-13	Regulatory	Briefings	<ul style="list-style-type: none"> •Waives the requirement for an oral briefing •Provides for alternative methods to conduct required voucher briefing 	12/31/20	
Home Forward (Portland)	PHA Oral Briefing	HUD Waiver - PIH 2020-05	Regulatory	Briefings	Home Forward will not have in-person, group briefings for new Housing Choice Voucher Participants. Instead, the briefing will be held by phone or other electronic medium and Participants will receive the materials to review independently.		
Keene Housing	Remote Appointments	HUD Waiver - PIH 2020-05	Regulatory	Briefings	Informal hearings to be held by telephone or video conference		
Keene Housing	Remote Appointments	HUD Waiver - PIH 2020-05	Regulatory	Briefings	Informal hearings to be held by telephone or video conference		
Keene Housing	Remote Appointments	HUD Waiver - PIH 2020-05	Regulatory	Briefings	Immigration informal hearings to be held by telephone or video conference. Keene Housing will email or mail any adverse documents intending to use at appeal.		
Oakland Housing Authority	PHA Oral Briefing	HUD Waiver - PIH 2020-05	Regulatory	Briefings	OHA will not have in-person, group briefings for new Housing Choice Voucher Participants. Instead, the briefing will be held by phone or other electronic medium and Participants will receive the materials to review independently.	Month to month	Possible extension through MTW
San Antonio Housing Authority	HCV-2 PHA Oral Briefing	HUD Waiver - PIH 2020-05	Regulatory	Briefings	<ul style="list-style-type: none"> • Waives the requirement for an oral briefing • Provides for alternative methods to conduct required voucher briefing 	7/31/20	No, HUD defined
Fairfax County Housing and Redevelopment Authority	PH-8 Resident Council Elections	HUD Waiver - PIH 2020-13	Regulatory	DERC	•Provides for delay in resident council elections	12/31/20	
Seattle Housing Authority	PH-8: Resident Council Elections	HUD Waiver - PIH 2020-33		DERC	Resident council elections: Provides for delay in resident council elections	6/30/21	
Fairfax County Housing and Redevelopment Authority	PH-3 Cost and Other Limitations: Types of Labor	HUD Waiver - PIH 2020-13	Regulatory	Development	•Allows for the use of force account labor for modernization activities in certain circumstances	12/31/20	
Fairfax County Housing and Redevelopment Authority	PH and HCV-5 Enterprise Income Verification (EIV) Monitoring	HUD Waiver - PIH 2020-13	Regulatory, Subregulatory	EIV	•Waives the mandatory EIV monitoring requirements.	12/31/20	
San Antonio Housing Authority	PH and HCV-5 EIV System Monitoring	HUD Waiver - PIH 2020-05	Regulatory, Subregulatory	EIV	Waives the mandatory EIV monitoring requirements.		No, HUD defined
Fairfax County Housing and Redevelopment Authority	PH-7 Over-Income Families	HUD Waiver - PIH 2020-13	Regulatory, Subregulatory	End of program	•Changes to timeframes for determination of over-income	12/31/20	
Seattle Housing Authority	[HUD Waiver]	HUD Waiver - PIH 2020-05		End of Program	Over-income families: Changes to timeframes for determination of over-income	12/31/20	
Fairfax County Housing and Redevelopment Authority	PH-6 Energy Audits	HUD Waiver - PIH 2020-13	Regulatory	Energy Audits	•Allows for delay in due dates of energy audits	Varies	
Home Forward (Portland)	Eviction Moratorium	HUD Waiver - PIH 2020-05		Eviction	Moratorium for non-payment due to COVID-19. Qualifying households can defer rent payments until state of emergency is over. Includes entering into a repayment agreement for up to 12 months.		
Keene Housing	Eviction Moratorium	HUD Waiver - PIH 2020-05		Eviction	no evictions for nonpayment of rent will be served before July 25, 2020. All policies related to fees, penalties or evictions not related to nonpayment still apply. All lease provisions remain in effect and residents are obligated to pay rent as usual.	7/25/20	
Seattle Housing Authority	HCV-5: Absence from unit	HUD Waiver - PIH 2020-33		Eviction	Absence from unit: Allows for PHA discretion on absences from units longer than 180 days; PHAs must not make HAP payments beyond 12/31/20 for units vacant more than 180 consecutive days	6/30/21	
Seattle Housing Authority	Activity #13 Homeownership and graduation from subsidy	Existing Activity		Eviction	SHA may freeze the 180-day end of participation clock for households during states of emergency and recovery	Ongoing; as needed	Yes - included as a 2021 update to Strategy 13. H.02: 180-day EOP clock
Seattle Housing Authority	HCV-6: Automatic Termination of HAP Contract	HUD Waiver - PIH 2020-33		Eviction	Allows PHA to extend the period of time after the last HAP payment is made before the HAP contract terminates automatically.	6/30/21	
Keene Housing	Food Assistance	Other		Food Assistance	Meals on wheels program staff are distributing meals through side entrance to enhance social distancing.		
Fairfax County Housing and Redevelopment Authority	PH and HCV-6 Family Self-Sufficiency (FSS) Contract of Participation: Contract Extension	HUD Waiver - PIH 2020-13	Regulatory	FSS	•Provides for extensions to FSS contract of participation	12/31/20	
Fairfax County Housing and Redevelopment Authority	PH-5 Community Service and Self-Sufficiency Requirement (CSSR)	HUD Waiver - PIH 2020-13	Regulatory, Statutory	FSS	•Temporarily suspends CSSR	3/31/21	
Home Forward (Portland)	FSS Contract of Participation	HUD Waiver - PIH 2020-05	Regulatory	FSS	If a family in the GOALS program has a COVID-related hardship that affects their participation, they will be able to stay in the program for up to two more years.		
Oakland Housing Authority	FSS Contract of Participation	HUD Waiver - PIH 2020-05	Regulatory	FSS	If a family in the GOALS program has a COVID-related hardship that affects their participation, they will be able to stay in the program for up to two more years.	12/31/20	No
San Antonio Housing Authority	PH and HCV-6 FSS Contract of Participation	HUD Waiver - PIH 2020-05	Regulatory	FSS	Provides for extensions to FSS contract of participation		No, HUD defined
Seattle Housing Authority	PH-5: Community Service & Self-Sufficiency Requirement	HUD Waiver - PIH 2020-33		FSS	Community Service & Self-Sufficiency Requirement: Temporarily suspends CSSR	6/30/21	Strongly support HUD and Congress use the opportunity to permanently sunset the CSSR.

Fairfax County Housing and Redevelopment Authority	HCV-10 Family Unification Program (FUP): FUP Youth Age Eligibility to Enter HAP Contract	HUD Waiver - PIH 2020-13	Statutory	FUP	•Allows PHAs to increase age to 26 for foster youth initial lease up	12/31/20	
Fairfax County Housing and Redevelopment Authority	HCV-11 Family Unification Program (FUP): Length of Assistance for Youth	HUD Waiver - PIH 2020-13	Statutory	FUP	•Allows PHAs to suspend terminations of assistance for FUP youth who will reach the 36-month limit between April 10, 2020, and December 31, 2020	12/31/20	
Fairfax County Housing and Redevelopment Authority	HCV-12 Family Unification Program (FUP): Timeframe for Referral	HUD Waiver - PIH 2020-13	Statutory	FUP	•Allows PHAs to accept referrals of otherwise eligible youth who will leave foster care within 120 days	12/31/20	
Home Forward (Portland)	FUP	HUD Waiver - PIH 2020-05	Statutory	FUP	Currently, Home Forward can only serve foster youth who are 24 or younger with a FUP voucher. With this waiver, foster youth who are 26 or younger are eligible for FUP vouchers.		
Keene Housing	FUP Eligibility Age	HUD Waiver - PIH 2020-05	Statutory	FUP	maximum eligibility age for FUP applicants increased to 26 years old until Dec 31, 2020	12/31/20	
Oakland Housing Authority	FUP	HUD Waiver - PIH 2020-05	Statutory	FUP	Currently, OHA can only serve foster youth who are 24 or younger with a FUP voucher. With this waiver, foster youth who are 26 or younger are eligible for FUP vouchers.	End of Year	Possible extension through MTW
Seattle Housing Authority	HCV-10: Family Unification Program (FUP): FUP Youth Age Eligibility to Enter HAP Contract	HUD Waiver - PIH 2020-33		FUP	FUP: Allows PHAs to increase age to 26 for foster youth initial lease up	6/30/21	
Seattle Housing Authority	HCV-11: FUP: Length of Assistance for Youth	HUD Waiver - PIH 2020-33		FUP	FUP: Allows PHAs to suspend terminations of assistance for FUP youth who will reach the 36-month limit between April 10, 2020 and June 31, 2021.	6/30/21	
Seattle Housing Authority	HCV-12: FUP: Timeframe for Referral	HUD Waiver - PIH 2020-33		FUP	FUP: Allows PHAs to accept referrals of otherwise eligible youth who will leave foster care within 120 days.	6/3/21	
Housing Authority of the County of San Bernardino	Activity 22: Streamlined Lease Assistance Program	Technical Amendment - Existing Activity		Hardship Policy	Families experiencing income loss due to COVID-19 may be approved for a hardship exemption. New hardship category will follow application, review, and approval policies for other hardship categories.	Not specified in activity; reassessed monthly.	Yes
King County Housing Authority		HUD Waiver - PIH 2020-05		Hardship Policy	Implement expedited approval of a Hardship Request for WIN Rent households. Currently, WIN Rent households are limited to only two, tenant-requested interim reviews within their 2-year Recertification cycle. However, an additional interim may be approved through a request for a Hardship Review and approval by the Hardship Committee. KCHA staff recommends an expedited procedure that will allow site-staff to approve a Hardship Request for an additional interim review for WIN Rent households whose income has been reduced as a result of a COVID-19-related reduction in employment income or job loss.		
King County Housing Authority		HUD Waiver - PIH 2020-05		Hardship Policy	Streamlined the Hardship Review process for all households by allowing the Hardship Committee Chair to review and recommend appropriate action on requests without the need for full Committee review.		
Fairfax County Housing and Redevelopment Authority	HCV-9 Homeownership Option: Homeownership Counseling	HUD Waiver - PIH 2020-13	Regulatory, Statutory	Homeownership	•Waives the requirement for the family to obtain pre-assistance counseling	12/31/20	
Fairfax County Housing and Redevelopment Authority	HCV-13 Homeownership: Maximum Term of Assistance	HUD Waiver - PIH 2020-13	Regulatory	Homeownership	•Allows a PHA to extend homeownership assistance for up to 1 additional year	12/31/20	
Reno Housing Authority	2014-05 Simplify rent calculations and increase the minimum rent	Technical Amendment - Existing Activity		Income Exclusion	Technical Amendment to MTW Plan that aims to assist families who have experienced a loss of income during the COVID-19 crisis. Any increase in income will be excluded from rent calculations through December 31, 2020 in order to provide families with some financial relief as businesses reopen and employment is secured. Change is applicable to both the HCV program and the Public Housing Program.	12/31/20	
Home Forward (Portland)	Annual Re-examination Income Verification	HUD Waiver - PIH 2020-05	Regulatory, Subregulatory	Income Verification	If residents and participants have a regular re-examination due and they are unable to collect third-party documentation of income, Home Forward may use self-certification of income in its place.		
Keene Housing	Interim Income Verification	HUD Waiver - PIH 2020-05	Regulatory, Subregulatory	Income Verification	Only conduct interims related to income loss and will accept verbal verification from employers of decreases to income and self-certification of household benefits loss until state of emergency is lifted.		
King County Housing Authority		HUD Waiver - PIH 2020-05	Regulatory, Subregulatory	Income Verification	Revised policies to equally weight all forms of tenant verifications to allow streamlined processing of reviews when standard third party verification may be difficult to obtain (delaying the review) or unavailable.		
Oakland Housing Authority	Activity #20-01: Emergency Relief from Interim Re-certifications	Technical Amendment - New Activity	Regulatory, Subregulatory	Income Verification	Temporarily relieves tenants of the immediate need to submit full detailed documentation of interim income/rent reduction requests.	Month to month	Yes
Oakland Housing Authority	Activity #14-01: Alternative Recertification Schedules	Technical Amendment - Existing Activity		Income Verification	During declared disaster periods, OHA will allow self-certification for all interim re-examinations, eliminating the need for verification of staff who may be limited or inundated with requests during an emergency.	Month to month	Yes
Oakland Housing Authority	Annual Re-examination Income Verification	HUD Waiver - PIH 2020-05	Regulatory, Subregulatory	Income Verification	If residents and participants have a regular re-examination due and they are unable to collect third-party documentation of income, OHA may use self-certification of income in its place.	7/31/20	Yes - if SIP not lifted

Oakland Housing Authority	EIV System Monitoring	HUD Waiver - PIH 2020-05	Regulatory, Subregulatory	Income Verification	OHA will monitor standard reports but will allow extensions for families to produce documentation due to closed facilities	7/31/20	Yes - if SIP not lifted
San Antonio Housing Authority	PH and HCV-3 Annual reexamination Income Verification	HUD Waiver - PIH 2020-05	Regulatory, Subregulatory	Income Verification	<ul style="list-style-type: none"> • Waives the requirements to use the income hierarchy, including the use of EIV, and will allow PHAs to consider self certification as the highest form of income verification • PHAs that implement this waiver will be responsible for addressing material income discrepancies that may arise later 	7/31/20	No, HUD defined
San Diego Housing Commission	2012-2. Biennial Reexamination Schedule	Technical Amendment - Existing Activity		Income Verification	Families can self-certify if not changes to EIV and HH composition. Processed as a full biennial	Until safe, feasible, and practical	Yes
Seattle Housing Authority	Activity #10 Local Rent Policy	Technical Amendment - Existing Activity		Income Verification	May include further streamlining income verification requirements by treating all sources of income verification equally and allowing residents to self-certify income over the phone, by email, or other means in lieu of a signature.	Ongoing	Yes - included as a 2021 update to Strategy 10.A.01: Streamlined income verification, authorizing a local income verification hierarchy
Seattle Housing Authority	Activity #12 Waiting Lists, Preferences, and Admission	Technical Amendment - Existing Activity	Regulatory, Statutory	Income Verification	Streamlined Eligibility Verification will apply to all MTW covered housing and may include further streamlining, such as treating all sources of income verification equally and allowing residents to self-certify income over the phone, by email, or other means in lieu of a signature.	Ongoing	Yes - included as a 2021 update to Strategy 12.A.02: Streamlined eligibility verification
Seattle Housing Authority	PH and HCV-5: Enterprise Income Verification (EIV) Monitoring	HUD Waiver - PIH 2020-33		Income Verification	EIV system monitoring: Waives the mandatory EIV monitoring requirements.	6/30/21	Included as part of the 2021 update to Strategy 10.A.01, authorizing a local income verification hierarchy - though we will continue to use EIV moving forward
Seattle Housing Authority	[IRS Waiver]	WSHFC Waiver - Notice 03.27.2020		Income Verification	Tax credit new move-ins: For all new move-ins, SHA will apply Revenue Procedure 2014-49 and WSHFC's notice posted March 27.	3/31/21	
Seattle Housing Authority	[IRS Waiver]	WSHFC Notice 03.27.2020		Income Verification	Tax credit new move-ins: For all new move-ins, SHA will apply Revenue Procedure 2014-49 and WSHFC's notice posted March 27.	3/31/21	
Fairfax County Housing and Redevelopment Authority	PH and HCV-3 Family Income and Composition: Annual Examination; Income Verification Requirements	HUD Waiver - PIH 2020-13	Regulatory, Statutory	Income Verifications	<ul style="list-style-type: none"> • Waives the requirements to use the income hierarchy, including the use of EIV, and will allow PHAs to consider self-certification as the highest form of income verification • PHAs that implement this waiver will be responsible for addressing material income discrepancies that may arise later 	12/31/20	
Fairfax County Housing and Redevelopment Authority	HQS-11 Homeownership Option: Initial HQS Inspection	HUD Waiver - PIH 2020-13	Regulatory, Statutory	Inspection	<ul style="list-style-type: none"> • Waives the requirement to perform an initial HQS inspection in order to begin making homeownership assistance payments • Requires family to obtain independent professional inspection 	12/31/20	
Fairfax County Housing and Redevelopment Authority	HQS-1 Initial Inspection Requirements	HUD Waiver - PIH 2020-13	Regulatory, Statutory	Inspections	<ul style="list-style-type: none"> • Changes initial inspection requirements, allowing for owner certification that there are no life-threatening deficiencies • Where self-certification was used, PHA must inspect the unit no later than 1-year anniversary of date of owner's certification. 	12/31/20	
Fairfax County Housing and Redevelopment Authority	HQS-2: Project- Based Voucher (PBV) Pre-HAP Contract Inspections: PHA Acceptance of Completed Units	HUD Waiver - PIH 2020-13	Regulatory, Statutory	Inspections	<ul style="list-style-type: none"> • Changes inspection requirements, allowing for owner certification that there are no life-threatening deficiencies • Where self-certification was used, PHA must inspect the unit no later than 1-year anniversary of date of owner's certification 	12/31/20	
Fairfax County Housing and Redevelopment Authority	HQS-3 Initial Inspection: Non-Life-Threatening Deficiencies (NLT) Option	HUD Waiver - PIH 2020-13	Regulatory, Subregulatory	Inspections	<ul style="list-style-type: none"> • Allows for extension of up to 30 days for owner repairs of non-life threatening conditions 	12/31/20	
Fairfax County Housing and Redevelopment Authority	HQS-4 HQS Initial Inspection Requirement: Alternative Inspection Option	HUD Waiver - PIH 2020-13	Regulatory, Subregulatory	Inspections	<ul style="list-style-type: none"> • Under Initial HQS Alternative Inspection Option - allows for commencement of assistance payments based on owner certification there are no life-threatening deficiencies • Where self-certification was used, PHA must inspect the unit no later than 1-year anniversary of date of owner's certification. 	12/31/20	
Fairfax County Housing and Redevelopment Authority	HQS-5 HQS Inspection Requirement: Biennial Inspections	HUD Waiver - PIH 2020-13	Regulatory, Statutory	Inspections	<ul style="list-style-type: none"> • Allows for delay in biennial inspections • All 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. 	12/31/20	
Fairfax County Housing and Redevelopment Authority	HQS-6 HQS Interim Inspections	HUD Waiver - PIH 2020-13	Regulatory, Statutory	Inspections	<ul style="list-style-type: none"> • Waives the requirement for the PHA to conduct interim inspection and requires alternative method • Allows for repairs to be verified by alternative methods. 	12/31/20	
Fairfax County Housing and Redevelopment Authority	HQS-7 PBV Turnover Unit Inspections	HUD Waiver - PIH 2020-13	Regulatory	Inspections	<ul style="list-style-type: none"> • Allows for PBV turnover units to be filled based on owner certification there are no life-threatening deficiencies • Allows for delayed full HQS inspection NLT than 1-year anniversary of date of owner's certification. 	12/31/20	
Fairfax County Housing and Redevelopment Authority	HQS-8: PBV HAP Contract: HQS Inspections to Add or Substitute Units	HUD Waiver - PIH 2020-13	Regulatory, Subregulatory, and Statutory	Inspections	<ul style="list-style-type: none"> • Allows for PBV units to be added or substituted in the HAP contract based on owner certification there are no life-threatening deficiencies • Allows for delayed full HQS inspection NLT 1-year anniversary of date of owner's certification 	12/31/20	

Fairfax County Housing and Redevelopment Authority	HQS-9 HQS Quality Control Inspections	HUD Waiver - PIH 2020-13	Regulatory	Inspections	•Provides for a suspension of the requirement for QC sampling inspections	12/31/20	
Fairfax County Housing and Redevelopment Authority	PH-12: Public Housing Agency Annual Self-Inspections	HUD Waiver - PIH 2020-13	Statutory, Regulatory	Inspections	•Ωατισς της ρεθνιρεμεντ τηατ της ΠΗΑ μυστ ινσπεκτ εαχη προφεχτ	12/31/20	
Fairfax County Housing and Redevelopment Authority	11a PHAS	HUD Waiver - PIH 2020-13	Regulatory	Inspections	•Allows for alternatives related to inspections •PHA to retain prior year PHAS score unless requests otherwise	Varies	
Home Forward (Portland)	Initial Inspection	HUD Waiver - PIH 2020-05	Statutory, Regulatory	Inspections	Home Forward will generally not send inspectors for physical inspections to occupied units. If a Participant is already living in a unit when an initial inspection is due, the Landlord will self-certify that the apartment meets to acceptable standard. After the emergency, a physical inspection will take place.		
Home Forward (Portland)	Biennial Inspection	HUD Waiver - PIH 2020-05	Statutory, Regulatory	Inspections	Bi- and tri-ennial inspections to reduce immediate workload. Scheduled inspections may be postponed.		
Home Forward (Portland)	Interim Inspection	HUD Waiver - PIH 2020-05	Statutory, Regulatory	Inspections	Home Forward will generally not send inspectors for physical inspections to occupied units. Landlords may use a form to self-certify that repairs have been completed.		
Home Forward (Portland)	PBV Turnover Inspections	HUD Waiver - PIH 2020-05	Regulatory	Inspections	Home Forward will generally not send inspectors for physical inspections to occupied units. Landlords can self-certify that units meet acceptable standards. After the emergency ends, a physical inspection will take place.		
Home Forward (Portland)	PBV HAP Contract - HQS Inspections to Add or Substitute Units	HUD Waiver - PIH 2020-05	Statutory, Regulatory	Inspections	Home Forward will generally not send inspectors for physical inspections to occupied units. Landlords can self-certify that units meet acceptable standards. After the emergency ends, a physical inspection will take place.		
Home Forward (Portland)	HQS QC Inspections	HUD Waiver - PIH 2020-05	Regulatory	Inspections	Home Forward will not send inspectors for physical inspections to occupied units.		
Housing Authority of the County of San Bernardino	Activity 13: Local Inspection Policies	Technical Amendment - Existing Activity	Statutory, Regulatory	Inspections	Extend the validity of most recently completed biennial HQS inspection by one year. Due date will be one year from the original due date.	Not specified in activity; not implemented.	Yes
Housing Authority of the County of San Bernardino	Activity 13: Local Inspection Policies	Technical Amendment - Existing Activity	Statutory, Regulatory	Inspections	Defer in person HQS inspections.	Not specified in activity; reassessed monthly.	Yes
Housing Authority of the County of San Bernardino	Activity 13: Local Inspection Policies	Technical Amendment - Existing Activity	Statutory, Regulatory	Inspections	Accept self-certification by the family and property owner/manager. May require photographs to accompany for some HQS components.	Not specified in activity; reassessed monthly.	Yes
Housing Authority of the County of San Bernardino	Activity 13: Local Inspection Policies	Technical Amendment - Existing Activity	Statutory, Regulatory	Inspections	As soon as it is safe or feasible, HACSB will conduct an inperson inspection to confirm the unit meets HQS requirements. If the unit fails, HACSB will follow the same policies applicable to failed biennial inspections.	Not specified in activity; reassessed monthly.	Yes
Keene Housing	HQS Inspections	HUD Waiver - PIH 2020-05	Statutory, Regulatory	Inspections	Limiting HQS inspections to initial/move in and health and safety inspections. Postponed to after Oct 31, 2020	31-Oct-20	
King County Housing Authority		HUD Waiver - PIH 2020-05	Statutory, Regulatory	Inspections	Delayed annual HQS inspections for PH, pBV and HCV programs until further notice		
King County Housing Authority		HUD Waiver - PIH 2020-05	Statutory, Regulatory	Inspections	Streamlined initial inspections for HCV by allowing landlords to self-certify units		
Oakland Housing Authority	Activity #17-01: Owner Incentives Program	Technical Amendment - Existing Activity		Inspections	OHA will extend the active period of the pre-qualifying unit inspections to 120 days and allow landlords to self-certify that the condition of the unit has not changed since the original inspection. OHA also may modify inspections to allow some virtual/videoconference inspections during the quarantine period.	Ongoing	Yes
Oakland Housing Authority	Interim Inspection	HUD Waiver - PIH 2020-05	Statutory, Regulatory	Inspections	OHA will generally not send inspectors for physical inspections to occupied units. Landlords may use a form to self-certify that repairs have been completed.	7/31/20	Possible extension through MTW
Oakland Housing Authority	HQS QC Inspections	HUD Waiver - PIH 2020-05	Regulatory	Inspections	OHA will suspend QC inspections.	10/31/20	No
Oakland Housing Authority	Homeownership HQS	HUD Waiver - PIH 2020-05	Statutory, Regulatory	Inspections	OHA will begin HAP payments based on independent inspection results	7/31/20	No
Oakland Housing Authority	PHAS	HUD Waiver - PIH 2020-05	Regulatory	Inspections	Delays REAC inspections and mitigates PHAS score impacts. Waiting on HUD to re-schedule inspections	End of Year	Depends on HUD to reschedule
San Antonio Housing Authority	HQS-1 Initial inspection	HUD Waiver - PIH 2020-05	Statutory, Regulatory	Inspections	Virtual inspections required first. Use HUD waiver as a last resort • Changes initial inspection requirements, allowing for owner certification that there are no life-threatening deficiencies • Where self-certification was used, PHA must inspect the unit no later than October 31, 2020.	7/31/20 10/31/20	No, HUD defined
San Antonio Housing Authority	HQS-2: PBV Pre-HAP Contract Inspections, PHA acceptance of completed units	HUD Waiver - PIH 2020-05	Statutory, Regulatory	Inspections	Virtual inspections required first. Use HUD waiver as a last resort • Changes initial inspection requirements, allowing for owner certification that there are no life-threatening deficiencies • Where self-certification was used, PHA must inspect the unit no later than October 31, 2020.	7/31/20 10/31/20	No, HUD defined
San Antonio Housing Authority	HQS-6 Interim Inspections	HUD Waiver - PIH 2020-05	Statutory, Regulatory	Inspections	Waives the requirement for the PHA to conduct interim inspection and requires alternative method • Allows for repairs to be verified by alternative methods	7/31/20	No, HUD defined

					Virtual inspections required first. Use HUD waiver as a last resort		
San Antonio Housing Authority	HQS-7 PBV Turnover Inspections	HUD Waiver - PIH 2020-05	Regulatory	Inspections	Allows for PBV turnover units to be filled based on owner certification there are no life-threatening deficiencies • Allows for delayed full HQS inspection	7/31/20 10/31/20	No, HUD defined
San Antonio Housing Authority	HQS-8: PBV HAP Contract – HQS Inspections to Add or Substitute Units	HUD Waiver - PIH 2020-05	Statutory, Regulatory	Inspections	Virtual inspection required first. Use HUD waiver as a last resort Allows for PBV units to be added or substituted in the HAP contract based on owner certification there are no life-threatening deficiencies • Allows for delayed full HQS inspection	7/31/20 10/31/20	No, HUD defined
San Antonio Housing Authority	HQS-9 HQS QC Inspections	HUD Waiver - PIH 2020-05	Regulatory	Inspections	Provides for a suspension of the requirement for QC sampling inspections	10/31/20	No, HUD defined
San Diego Housing Commission	2010-1. Implement a revised inspection protocol	Technical Amendment - Existing Activity		Inspections	Both landlords and tenants will be required to self-certify that the building, premises, and unit meet HQS requirements	Until safe, feasible, and practical	Yes
San Diego Housing Commission	2010-1. Implement a revised inspection protocol	Technical Amendment - Existing Activity		Inspections	Full inspections will be conducted if self-certification indicates any health or safety concerns	Until safe, feasible, and practical	Yes
Santa Clara County Housing Authority	Activity 2020-6: Reduced Frequency of Periodic Inspections	Technical Amendment - New Activity		Inspections	Extend due dates for ongoing biennial HQS inspections by one year because of the social distancing requirement in place.	June 30, 2021 or six months following lifting of the shelter in place rule	If SCCCHA decides to make any of these activities permanent, it will re-propose it with a full 30-day review, public hearing, etc.
Seattle Housing Authority	Activity #3 Inspection Protocol	Technical Amendment - Existing Activity		Inspections	Accepting Owner or Property Manager Self-certification in place of new lease inspections using risk management criteria for new move-ins to facilitate housing access. And, deferring inspections scheduled during this time until the agency has recovered from the crisis or the next regular inspection is due.	Ongoing, as needed	Yes - included as a 2021 update to MTW Strategy 3.A.01
Seattle Housing Authority	Activity #9 Project-based Program	Technical Amendment - Existing Activity		Inspections	Accepting Owner or Property Manager Self-certification in place of new lease inspections using risk management criteria for new move-ins to facilitate housing access and deferring inspections scheduled during this time until the agency has recovered from the crisis or the next regular inspection is due.	Ongoing, as needed	Yes - included as a 2021 update to MTW Strategy 3.A.01
Seattle Housing Authority	HQS-2: Project-Based Voucher (PBV) Pre-HAP Contract Inspections, PHA Acceptance of Completed Units	HUD Waiver - PIH 2020-33		Inspections	Project-Based Voucher (PBV) Pre-HAP Contract Inspections, PHA Acceptance of Completed Units: Changes inspection requirements, allowing for owner certification that there are no life-threatening deficiencies; Where self-certification was used, PHA must inspect the unit no later than October 31, 2020.	Ongoing, as needed	Using MTW authority per SHA's MTW Plan
Seattle Housing Authority	Activity #3 Inspection Protocol	Technical Amendment - Existing Activity		Inspections	Deferring inspections scheduled during this time until the agency has recovered from the crisis or the next regular inspection is due.	Ongoing; as needed	Yes - included as a 2021 update to MTW Strategy 3.A.03
Seattle Housing Authority	HQS-9: HQS Quality Control Inspections	HUD Waiver - PIH 2020-33; Update to MTW Activity		Inspections	Provides for a suspension of the requirement for quality control sampling inspections.	Ongoing; as needed	Yes - included as a 2021 update to Strategy 3.A.01: Private sector cost benefit and risk management approaches to inspections
Seattle Housing Authority	Activity #9 Project-based Program	Technical Amendment - Existing Activity		Inspections	Deferring inspections scheduled during this time until the agency has recovered from the crisis or the next regular inspection is due.	Ongoing; as needed	Yes - included as a 2021 update to Strategy 3.A.03: Private sector cost benefit and risk management approaches to inspections
Cambridge Housing Authority	CE.2006.01 - RENT SIMPLIFICATION PROGRAM (RSP)/HCV	Technical Amendment - Existing Activity		Interim Recertifications	Waiving limit of two interims between recertification for non-elderly/non-disabled households	Not stated	
Fairfax County Housing and Redevelopment Authority	PH and HCV-4 Family Income and Composition: Interim Examinations	HUD Waiver - PIH 2020-13	Regulatory, Subregulatory, and Statutory	Interim Recertifications	• Waives the requirement to use the income verification requirements, including the use of EIV, for interim reexaminations	12/31/20	
Home Forward (Portland)	Interim Re-examinations	HUD Waiver - PIH 2020-05		Interim Recertifications	Expedited processing of interim income certification requests. If residents and participants want to process an interim (such as income decrease) and they are unable to collect third-party documentation of income, Home Forward may use self-certification of income in its place.		
Housing Authority of the County of San Bernardino	Activity 22: Streamlined Lease Assistance Program	Technical Amendment - Existing Activity		Interim Recertifications	Interim recertifications, with the exception of interims processed for an approved hardship, will be deferred to the earliest practical and feasible date.	Not specified in activity; reassessed monthly.	Yes
King County Housing Authority		HUD Waiver - PIH 2020-05		Interim Recertifications	Waive the requirement that a resident must report a decrease in income prior to the 22nd of the month in order to receive a rent reduction effective on the first of the following month. Currently, changes reported after the 22nd, result in reduced rent effective the first of the month. This change will allow clients faster access to a rent reduction.		
Lincoln Housing Authority	Minimum Earned Income	Technical Amendment - Existing Activity		Interim Recertifications	Due to the economic disruption and the Covid-19 state of emergency declared by the State of Nebraska on March 13, 2020, LHA is suspending implementation of the Minimum Earned Income for all interim re-exam changes effective May 1, 2020. The suspension will end and LHA will again implement MEI with all reviews effective January 1, 2021.	1/1/21	
Oakland Housing Authority	Activity #20-01: Emergency Relief from Interim Re-certifications	Technical Amendment - New Activity	Statutory, Regulatory, Subregulatory	Interim Recertifications	Pause requirements for PHA to perform and submit interim recertifications for eligible participants in order to redirect staffing resources to more critical administrative tasks during a time of emergency.	Month to month	Yes

Oakland Housing Authority	Interim Re-examinations	HUD Waiver - PIH 2020-05	Statutory, Regulatory, Subregulatory	Interim Recertifications	Expedited processing of interim income certification requests. If residents and participants want to process an interim (such as income decrease) and they are unable to collect third-party documentation of income, OHA may use self-certification of income in its place.	7/31/20	Yes - if SIP not lifted
San Antonio Housing Authority	PH and HCV-4 Interim reexaminations	HUD Waiver - PIH 2020-05	Statutory, Regulatory, Subregulatory	Interim Recertifications	Waives the requirement to use the income verification requirements, including the use of EIV, for interim reexaminations	7/31/20	No, HUD defined
San Diego Housing Commission	2010-7. Adopt a local interim certification policy	Technical Amendment - Existing Activity		Interim Recertifications	Waives requirement that decrease of income should be for 90 days or more	Until safe, feasible, and practical	Yes
San Diego Housing Commission	2010-7. Adopt a local interim certification policy	Technical Amendment - Existing Activity		Interim Recertifications	Waives limit of one decrease of income interim in last 12 months	Until safe, feasible, and practical	Yes
San Diego Housing Commission	2010-7. Adopt a local interim certification policy	Technical Amendment - Existing Activity		Interim Recertifications	Waives 21% decrease in rent portion requirement	Until safe, feasible, and practical	Yes
San Diego Housing Commission	2010-7. Adopt a local interim certification policy	Technical Amendment - Existing Activity		Interim Recertifications	Waives No Fault of Your Own policy	Until safe, feasible, and practical	Yes
San Diego Housing Commission	2012-1. Path to Success	Technical Amendment - Existing Activity		Interim Recertifications	All affected households at 20% of adjusted annual income	Until safe, feasible, and practical	Yes
Keene Housing	Voucher Issuance	HUD Waiver - PIH 2020-05		Issuance	Will not issue new vouchers until state of emergency is lifted of able to reinstate the existing policy		
Fairfax County Housing and Redevelopment Authority	HCV-4 PHA Approval of Assisted Tenancy: When HAP Contract is Executed	HUD Waiver - PIH 2020-13	Regulatory	Leasing	•Allows for PHA discretion on absences from units longer than 180 days •PHAs must not make HAP payments beyond 12/31/20 for units vacant more than 180 consecutive days	12/31/20	
Fairfax County Housing and Redevelopment Authority	HCV-14 Mandatory Removal of Unit from PBV HAP Contract	HUD Waiver - PIH 2020-13	Regulatory	Leasing	•Allows a PHA to keep a PBV unit under contract for a period of time that extends beyond 180 from the last HAP but does not extend beyond December 31, 2020	12/31/20	
Home Forward (Portland)	PHA Approval of Assisted Tenancy	HUD Waiver - PIH 2020-05	Regulatory	Leasing	Home Forward may execute HAP contracts that go beyond the 60-day period. We will work with landlords to have contract signed as quickly as possible.		
Keene Housing	Minimum Rent Waiver	HUD Waiver - PIH 2020-05		Minimum Rent	KH is waiving the \$125 minimum rent for Safety Net eligible households whose only sources of income has decreased to zero due to COVID-19		
San Diego Housing Commission	2012-1. Path to Success	Technical Amendment - Existing Activity		Minimum Rent	Minimum rents reverted to zero for all households affected	Until safe, feasible, and practical	Yes
Fairfax County Housing and Redevelopment Authority	HQS-10 Housing Quality Standards: Space and Security	HUD Waiver - PIH 2020-13	Regulatory	Occupancy	•Waives the requirement that each dwelling unit have at least 1 bedroom or living/sleeping room for each 2 persons.	12/31/20	
Home Forward (Portland)	Space and Security	HUD Waiver - PIH 2020-05	Regulatory	Occupancy	Home Forward will not require that the Resident or Participant transfer to a different size unit, if there are more than the allowable number of people living in a unit for the size of the unit.		
Oakland Housing Authority	Activity #11-01: PBV Occupancy Standards	Technical Amendment - Existing Activity	Regulatory	Occupancy	OHA will allow families to occupy units for which their family composition may not meet the occupancy standard. During the crisis, OHA chooses to move to a housing first prioritization, removing barriers to housing, like occupancy standards, for otherwise eligible homeless families.	Ongoing	Yes
Seattle Housing Authority	HQS-10: HQS Space and Security	HUD Waiver - PIH 2020-33		Occupancy	HQS space and security: Waives the requirement that each dwelling unit have at least 1 bedroom or living/sleeping room for each 2 persons. Enables households to add a member(s) even if it causes unit to not meet space requirements. Does not apply to new or initial leases.	Remains in effect through 11/30/2021 or end of lease, whichever is sooner.	
Fairfax County Housing and Redevelopment Authority	PH-1 Fiscal Closeout of Capital Grant Funds	HUD Waiver - PIH 2020-13	Regulatory	Paperwork Reduction	•Extension of deadlines for ADCC and AMCC	Varies	
Fairfax County Housing and Redevelopment Authority	PH-4 ACOP: Adoption of Tenant Selection Policies	HUD Waiver - PIH 2020-13	Regulatory	Paperwork Reduction	•Establishes an alternative requirement that policies may be adopted without board approval •Any provisions adopted informally must be adopted formally NLT December 31, 2020	12/31/20	
Fairfax County Housing and Redevelopment Authority	12c Extension of Deadline for Programmatic Obligation and Expenditure of Capital Funds	HUD Waiver - PIH 2020-13	Regulatory, Statutory	Paperwork Reduction	For all open Capital Fund grants, one-year extension from the obligation and expenditure end dates in LOCCS as of April 10, 2020		
Seattle Housing Authority	Activity #2 Family Self-Sufficiency Program	Technical Amendment - Existing Activity		Paperwork Reduction	Allow residents to approve contracts or other required documentation over the phone, by email, or other means in lieu of a signature.	Ongoing	Yes - included in umbrella activity in 2021 MTW Plan to cover all paperwork (when allowable by law)
Seattle Housing Authority	PH-1 Fiscal Closeout of Capital Grant Funds	HUD Waiver - PIH 2020-33		Paperwork Reduction	Fiscal closeout of Capital Grant Funds: Extension of deadlines for ADCC and AMCC	6-month extension for each form	
Seattle Housing Authority	PH-4: ACOP Adoption of Tenant Selection Policies	HUD Waiver - PIH 2020-33		Paperwork Reduction	ACOP adoption of tenant selection policies: Changes to approval process for ACOP	6/30/21	

Seattle Housing Authority	HCV-1: Administrative Plan	HUD Waiver - PIH 2020-33		Paperwork Reduction	HCV Administrative Plan: Waives the requirement to adopt revisions to the admin plan	6/30/21	
Seattle Housing Authority	HCV-4: PHA Approval of Assisted Tenancy	HUD Waiver - PIH 2020-33		Paperwork Reduction	PHA approval of assisted tenancy: Provides for HAP payments for contracts not executed within 60 days; PHA must not pay HAP to owner until HAP contract is executed	6/30/21	
Seattle Housing Authority	12c: Extension of Deadline for Programmatic Obligation and Expenditure of Capital Funds	HUD Waiver - PIH 2020-33		Paperwork Reduction	Deadline for reporting Operating and Capital Fund expenditures: HUD is extending both the obligation end date and the expenditure end date for all open Capital Fund grants by one year from the current obligation and expenditure end date; however, no programmatic expenditure end date shall be extended beyond one month prior to the closure of the relevant appropriation account, pursuant to 31 U.S.C. § 1552.	18-month extension	
Seattle Housing Authority	11c: Uniform Financial Reporting Standards; Filing of Financial Reports; Reporting Compliance Dates	HUD Waiver - PIH 2020-33		Paperwork Reduction	Uniform financial reporting standards; Filing of financial reports; Reporting Compliance Dates: Extends reporting deadlines*	3/31/21	
Fairfax County Housing and Redevelopment Authority	HCV-7 Increase in Payment Standard During HAP Contract Term	HUD Waiver - PIH 2020-13	Regulatory	Payment Standards	•Provides PHAs with the option to increase the payment standard for the family at any time after the effective date of the increase, rather than waiting for the next regular reexamination to do so.	12/31/20	
Housing Authority of the County of San Bernardino	Activity 12: Local Payment Standards and Alternative Flat Rents	Technical Amendment - Existing Activity		Payment Standards	Defer the annual review and update to local payment standards based on the availability of a third-party consultant to perform the market assessment.	N/A	Yes
Oakland Housing Authority	Increase in Payment Standard	HUD Waiver - PIH 2020-05	Regulatory	Payment Standards	OHA will increase payment standards as needed to provide sooner assistance to families	7/31/20	Possible extension through MTW
San Antonio Housing Authority	HCV-7 Increase in Payment Standard	HUD Waiver - PIH 2020-05	Regulatory	Payment Standards	Only if PH and HCV-1 is implemented for HCV households. Provides PHAs with the option to increase the payment standard for the family at any time after the effective date of the increase, rather than waiting for the next regular reexamination to do so.	12/31/20	No, HUD defined
Housing Authority of Champaign County, IL		HUD Waiver - PIH 2020-05		PIU	implemented a moratorium on lease enforcements for all non-violent and non-criminal activity related evictions for properties owned or managed by the authority.		
Fairfax County Housing and Redevelopment Authority	HCV-1 Administrative Plan	HUD Waiver - PIH 2020-13	Regulatory	Plans	•Establishes an alternative requirement that policies may be adopted without board approval •Any provisions adopted informally must be adopted formally NLT December 31, 2020	12/31/20	
Fairfax County Housing and Redevelopment Authority	PH-11: Designated Housing Plan Renewals	HUD Waiver - PIH 2020-13	Statutory	Plans	•Extends the Plan's effective period through December 31, 2020, for Plans due to expire between the date of this Notice and December 31, 2020.	12/31/20	
Fairfax County Housing and Redevelopment Authority	12b Designated Housing Plans: HUD 60-Day Notification	HUD Waiver - PIH 2020-13	Statutory	Plans	•Allows for HUD to delay notification about designated housing plan	7/31/20	
Home Forward (Portland)	Administrative Plan	HUD Waiver - PIH 2020-05	Regulatory, Statutory	Plans	Usually, if Home Forward were to make a significant change to the Administrative Plan, they would have to present the change to the Board of Commissioners at a public meeting. With this waiver, we can make emergency changes without going through that process.		
Home Forward (Portland)	ACOP (Admissions and Continued Occupancy Policy) -	HUD Waiver - PIH 2020-05	Regulatory	Plans	Usually, if Home Forward were to make a significant change to policy, they would have to present the change to the Board of Commissioners. With this waiver, we can make emergency changes without going through that process.		
Oakland Housing Authority	ACOP (Admissions and Continued Occupancy Policy) -	HUD Waiver - PIH 2020-05	Regulatory	Plans	Usually, if OHA were to make a significant change to policy, they would have to present the change to the Board of Commissioners. With this waiver, we can make emergency changes without going through that process.	7/31/20	No
Oakland Housing Authority	Administrative Plan	HUD Waiver - PIH 2020-05	Regulatory, Statutory	Plans	Usually, if OHA were to make a significant change to the Administrative Plan, they would have to present the change to the Board of Commissioners at a public meeting. With this waiver, we can make emergency changes without going through that process.	7/31/20	No
San Antonio Housing Authority	PH-4 ACOP	HUD Waiver - PIH 2020-05	Regulatory	Plans	Changes to approval process for ACOP	7/31/20	No, HUD defined
San Antonio Housing Authority	HCV-1 Administrative Plan	HUD Waiver - PIH 2020-05	Regulatory, Statutory	Plans	Waives the requirement to adopt revisions to the admin plan	7/31/20	No, HUD defined
Housing Authority of the County of San Bernardino	Activity 8: Local Policies for Portability	Technical Amendment - Existing Activity		Portability	Temporarily suspend acceptance of port ins from other housing authorities.	Not specified in activity; reassessed monthly.	Yes
Housing Authority of the County of San Bernardino	Activity 18: Property Management Innovation	Technical Amendment - Existing Activity		Property Management	Utilized remote meeting options for meetings between HACSB employees and families	Not specified in activity; reassessed monthly based upon official guidance from CDC, State, and other sources.	Yes

Fairfax County Housing and Redevelopment Authority	PH-10 Tenant Notifications for Changes to Project Rules and Regulations	HUD Waiver - PIH 2020-13	Regulatory	Public housing	•Advance notice not required except for policies related to tenant charges	12/31/20	
San Antonio Housing Authority	PH-10 Tenant notifications	HUD Waiver - PIH 2020-05	Regulatory	Public Housing	Advance notice not required except for policies related to tenant charges	7/31/20	No, HUD defined
San Diego Housing Commission	2018-1. Moving Home: A Rapid Rehousing Program	Technical Amendment - Existing Activity		Rapid Rehousing	Program budget increase	Ongoing	Yes
Seattle Housing Authority	HCV-2: PHA Oral Briefing	HUD Waiver - PIH 2020-33		Reasonable Accommodation	PHA oral briefings: Waives the requirement for an oral (in-person) briefing; Provides for alternative methods to conduct required voucher briefing (such as video, conference call, etc.)	6/30/21	
Cambridge Housing Authority	HC. 2008.08 - IMPLEMENT RECERTIFICATIONS EVERY TWO YEARS FOR HOUSEHOLDS/HCV	Technical Amendment - Existing Activity		Recertifications	All elderly/disabled households with only fixed incomes to use income from prior recertification. Participants will not be required to complete recertification packet. Payments standards will be updated, and medical expenses will be taken from last recertification. Affected households will follow biennial schedule for next recertification.	12/31/20	
Fairfax County Housing and Redevelopment Authority	PH and HCV-2 Family Income and Composition: Delayed Annual Examinations	HUD Waiver - PIH 2020-13	Regulatory, Statutory	Recertifications	•Permits the PHA to delay the annual reexamination of income and family composition •HCV PHAs must implement HCV-7 for impacted families if they implement this waiver	12/31/20	
Fairfax County Housing and Redevelopment Authority	Reduction in Frequency of Reexaminations – Non Work-Able Households	MTW Waiver	FY2020 MTW Plan Technical Amendment (MTW Activity 2014-1)	Recertifications	•Non work-able households will move to a five-year reexamination schedule. This change will impact reexaminations beginning June 2020.	4/10/20	
Home Forward (Portland)	Family Income and Composition - Delayed Annual Re-examinations	HUD Waiver - PIH 2020-05	Regulatory, Statutory	Recertifications	Bi- and tri-ennial recertifications to reduce immediate workload. If a Resident or Participant has a review due, Home Forward will work to complete it on the regular schedule. If there is a COVID-related reason that isn't possible, the review may be delayed.		
Housing Authority of the County of San Bernardino	Activity 4: Biennial and Triennial Recertifications	Technical Amendment - Existing Activity	Regulatory, Statutory	Recertifications	Extend validity of most recently completed biennial or triennial recertification by one year. Due date of the next biennial or triennial recertification will be one year from the original due date, and future recertifications will follow the biennial/triennial schedule.	Not specified in activity; determined internally (expected to end with July recerts).	Yes
Inlivan (formerly Charlotte Housing Authority)		HUD Waiver - PIH 2020-05	Regulatory, Statutory	Recertifications	Extend biennial recertifications into triennial recertifications		
Keene Housing	Recertification	HUD Waiver - PIH 2020-05	Regulatory, Statutory	Recertifications	Suspend all recertifications until state of emergency is lifted		
Lincoln Housing Authority	Minimum Earned Income	Technical Amendment - Existing Activity		Recertifications	Due to the economic disruption and the Covid-19 state of emergency declared by the State of Nebraska on March 13, 2020, LHA is suspending implementation of the Minimum Earned Income for all Annual or Biennial Re-exam changes effective June 1, 2020. The suspension will end and LHA will again implement MEI with all reviews effective January 1, 2021.	1/1/21	
Lincoln Housing Authority	Biennial Reexaminations	Technical Amendment - Existing Activity		Recertifications	Due to the economic disruption and the Covid-19 state of emergency declared by the State of Nebraska on March 13, 2020, LHA is extending this policy to all households with Annual Reexaminations due July 1, 2020 through December 31, 2020. LHA will place households with Annual Re-examinations due during those dates on a biennial schedule and complete the Reexamination in 2021. LHA will continue to complete Biennial Re-examinations that are due. This will allow LHA to prioritize completion of interim reviews from loss of income and to adjust to alternate working arrangements and office closures. Effective with Re-examinations due January 1, 2021, LHA will revert to Biennial Re-examinations for elderly and disabled households only.	1/1/21	
Oakland Housing Authority	Family Income and Composition - Delayed Annual Re-examinations	HUD Waiver - PIH 2020-05		Recertifications	Annual, Bi- and tri-ennial recertifications to reduce immediate workload. If a Resident or Participant has a review due, OHA will work to complete it on the regular schedule. If there is a COVID-related reason that isn't possible, the review may be delayed.	Month to month	No
San Antonio Housing Authority	PH and HCV-2 Family income and composition –delayed annual reexaminations	HUD Waiver - PIH 2020-05		Recertifications	• Permits the PHA to delay the annual reexamination of income and family composition • HCV PHAs must implement HCV-7 for impacted families if they implement this waiver	12/31/20	No, HUD defined
San Diego Housing Commission	2012-2. Biennial Reexamination Schedule	Technical Amendment - Existing Activity		Recertifications	Full recertifications only performed by staff if significant changes to income or household composition	Until safe, feasible, and practical	Yes
San Diego Housing Commission	2012-2. Biennial Reexamination Schedule	Technical Amendment - Existing Activity	Regulatory, Statutory	Recertifications	Most recent recertification will have validity extended up to one year. Due date of next full recert will fall two years from original due date.	Until safe, feasible, and practical	Yes
San Diego Housing Commission	2012-2. Biennial Reexamination Schedule	Technical Amendment - Existing Activity		Recertifications	EIV unreported income reconciliation threshold increased to \$5,000	Until safe, feasible, and practical	Yes

Santa Clara County Housing Authority	Activity 2009-1: Reduced Frequency of Tenant Re-Examination	Technical Amendment - Existing Activity	Regulatory, Statutory	Recertifications	Extend regular reexamination due dates by one year to provide breathing room for staff to address the reduction in workforce here in the office and the high number of interim changes in income.	June 30, 2021 or six months following lifting of the shelter in place rule	If SCCHA decides to make any of these activities permanent, it will re-propose it with a full 30-day review, public hearing, etc.
Seattle Housing Authority	Activity #10 Local Rent Policy	Technical Amendment - Existing Activity		Recertifications	May defer regular rent reviews for all household types during this time until the agency has recovered from the crisis or the next regular rent review is due. Residents will retain the opportunity to have an interim review.	Ongoing, as needed	Yes - included as a 2021 update to Activity 10 for emergency use purposes
Seattle Housing Authority	[IRS Waiver]	WSHFC Waiver - Memorandum 03.16.2020		Recertifications	Tax-credit annual renewals: SHA may perform self-certification for all tax credit projects following the protocols outlined in Washington State Housing Finance Commission [WSHFC]'s memorandum of March 16, 2020.	Per the memo dated 3/16/2020, "as soon as possible"	
Seattle Housing Authority	[IRS Waiver]	WSHFC Waiver - Notice 03.27.2020		Recertifications	For all projects that typically would have required Year 1 full certifications, SHA may perform self-certifications following the protocols outlined in WSHFC's memorandum of March 16 and notice of March 27	3/31/21	
Fairfax County Housing and Redevelopment Authority	Modify the Calculation of the Family Share of Rent for the Housing Choice Voucher Program	MTW Waiver	FY 2020 MTW Plan Technical Amendment (MTW Activity 2018A-1)	Rent burden	<ul style="list-style-type: none"> Excludes asset income from income calculations for families with assets under \$50,000 and accepts self-certifications. Simplifies income verification by accepting documentation that is up to 120 days old and by accepting self-certifications from program participants with income decreases. Simplifies medical/disability expense deductions by allowing for self-certification up to \$1,000. 	4/10/20	
Santa Clara County Housing Authority	Activity 2020-5: Eliminate the 40% of Income Cap at Initial Leasing	Technical Amendment - New Activity		Rent Burden	Increase the maximum 40% of income tenant rent portion at initial leasing to 50%. We hope this will increase the availability of units for voucher holders so that they can get leased and into a unit quicker.	June 30, 2021 or six months following lifting of the shelter in place rule	If SCCHA decides to make any of these activities permanent, it will re-propose it with a full 30-day review, public hearing, etc.
Home Forward (Portland)		HUD Waiver - PIH 2020-05		Rent Increases	Rescinded existing rent increases and halting any new rent incureses for unsubsidized households		
Fairfax County Housing and Redevelopment Authority	PH and HCV-1 PHA 5-Year and Annual Plan Submission Dates: Significant Amendment Requirements	HUD Waiver - PIH 2020-13	Regulatory, Statutory	Reporting	<ul style="list-style-type: none"> Alternative dates for submission Changes to significant amendment process 	12/31/20	
Fairfax County Housing and Redevelopment Authority	11b SEMAP	HUD Waiver - PIH 2020-13	Regulatory	Reporting	PHA to retain prior year SEMAP score unless requests otherwise	Varies	
Fairfax County Housing and Redevelopment Authority	11c Uniform Financial Reporting Standards: Filing of Financial Reports; Reporting Compliance Dates	HUD Waiver - PIH 2020-13	Regulatory	Reporting	<ul style="list-style-type: none"> Allows for extensions of financial reporting deadlines 	Varies	
Fairfax County Housing and Redevelopment Authority	12a PHA Reporting Requirements on HUD Form 50058	HUD Waiver - PIH 2020-13	Regulatory, Subregulatory	Reporting	<ul style="list-style-type: none"> Waives the requirement to submit 50058 within 60 days Alternative requirement to submit within 90 days of the effective date of action 	12/31/20	
Oakland Housing Authority	50058 delays	HUD Waiver - PIH 2020-05	Regulatory, Subregulatory	Reporting	Delays 58 submissions if necessary to 90 days - terminates on 12/31/2020	Month to month	No
Oakland Housing Authority	CSSR Requirement	HUD Waiver - PIH 2020-05	Regulatory, Statutory	Self-Sufficiency	Waives CSSR requirement until next regular re-examination	3/31/21	No
San Antonio Housing Authority	PH-5 CSSR	HUD Waiver - PIH 2020-05	Regulatory, Statutory	Self-Sufficiency	Temporarily suspends CSSR	3/31/21	No, HUD defined
Boulder Housing Partners	Rent Relief	CARES Act		Short-Term Assistance	Rent relief program for non-HCV/PH residents living in BHP properties.		
Oakland Housing Authority	Activity #20-01: Emergency Relief from Interim Re-certifications	Technical Amendment - New Activity		Short-Term Assistance	Provide short-term supplemental housing assistance for eligible families that covers all or a portion of the tenant portion of the rent in addition to existing subsidy provided by OHA.	Month to month	Yes
Seattle Housing Authority	Activity #18 Short-term assistance	Existing Activity		Short-term assistance	Short-term rental assistance: SHA may provide short-term rental and related assistance to help families, students, adults and youth obtain and retain housing.	Ongoing	Yes - included as a 2021 update to Strategy 18.A.03: Short-term rental assistance
Housing Authority of Champaign County, IL				Staff Flexibilities	Financial relief package for agency staff		
Housing Authority of the County of San Bernardino	Activity 20: Term-Limited Lease Assistance – (formerly "Five-Year Lease Assistance Program" and "Term Limits")	Technical Amendment - Existing Activity		Staff Flexibilities	Conduct annual meetings between participants and caseworker by telephone or using virtual meetings. If not possible, annual meetings to be deferred until able to conduct.	Not specified in activity; reassessed monthly based upon official guidance from CDC, State, and other sources.	Yes
Keene Housing	Remote Appointments	HUD Waiver - PIH 2020-05	Regulatory	Staff Flexibilities	All transactions with applicants, residents and voucher holders will be conducted by phone, email, mail and video conferencing		
Keene Housing	Work from Home	Other		Staff Flexibilities	All housing and services staff have executed a confidentiality agreement and are temporarily permitted to work from home and must disclose any sensitive information they are taking in their possession.		

King County Housing Authority		HUD Waiver - PIH 2020-05	Regulatory	Staff Flexibilities	Modified office hours and limited public access to reduce exposure to clients, staff, and community		
King County Housing Authority		HUD Waiver - PIH 2020-05		Staff Flexibilities	Placed a temporary hold on non-urgent and non-emergency work orders to reduce exposure risks to tenants and staff.		
Seattle Housing Authority	[HUD Waiver]	Extension granted by request		Staffing	2019 MTW Report deadline extended by one month	4/30/20	
Housing Authority of the County of San Bernardino	Activity 23: No Child Left Unsheltered	Technical Amendment - Existing Activity		Supportive Services	Supportive services may be reduced or deferred based on availability of staff and partners	Not specified in activity; not implemented.	Yes
Fairfax County Housing and Redevelopment Authority	PH-2 Total Development Costs	HUD Waiver - PIH 2020-13	Regulatory	TDC	•Waives the TDC and HCC limits permitting approval of amounts in excess of published TDC by 25% to 50% on a case by case basis	12/31/20	
Fairfax County Housing and Redevelopment Authority	HCV-6 Automatic Termination of HAP Contract	HUD Waiver - PIH 2020-13	Regulatory	Termination	•Allows PHA to extend the period of time after the last HAP payment is made before the HAP contract terminates automatically.	12/31/20	
Home Forward (Portland)	Absence from Unit	HUD Waiver - PIH 2020-05	Regulatory	Termination	Until 12/31/2020, being absent from a unit for longer than 180 days in a row will not automatically be considered a program violation.	12/31/20	
Home Forward (Portland)	Automatic Termination of the HAP Contract	HUD Waiver - PIH 2020-05	Regulatory	Termination	Until 12/31/2020, Home Forward will not automatically terminate assistance after 180 days of paying zero subsidy.	12/31/20	
Housing Authority of Champaign County, IL	Program Terminations	HUD Waiver - PIH 2020-05	Regulatory	Termination	Termination will not be processed at this time.		
Housing Authority of the County of San Bernardino	Activity 20: Term-Limited Lease Assistance – (formerly “Five-Year Lease Assistance Program” and “Term Limits”)	Technical Amendment - Existing Activity	Regulatory	Termination	End of term (EOT) for any participant scheduled between April 1 and Sept 30 2020 will be delayed by 6 months. Timeframe may be extended.	9/30/20	Yes
Housing Authority of the County of San Bernardino	Activity 24: Transition for Over-Income Public Housing/Housing Choice Voucher Families	Technical Amendment - Existing Activity	Regulatory	Termination	Delay by six months the termination of assistance for any family whose six month transition period is scheduled to end between 4/1 and 9/30/2020. May be extended.	9/30/20	Yes
Keene Housing	Termination	HUD Waiver - PIH 2020-05	Regulatory	Termination	Will not terminate a household's assistance for non-compliance with program requirements until state of emergency is lifted or able to reinstate existing policy.	12/31/20	
Oakland Housing Authority	Overincome	HUD Waiver - PIH 2020-05	Regulatory, Statutory	Termination	Delays timeframes for overincome determination and actions taken based on that status	End of Year	No
San Antonio Housing Authority	HCV-5 Absence from unit	HUD Waiver - PIH 2020-05	Regulatory	Termination	Allows for PHA discretion on absences from units longer than 180 days • PHAs must not make HAP payments beyond 12/31/20 for units vacant more than 180 consecutive days	12/31/20	No, HUD defined
San Antonio Housing Authority	HCV-6 Automatic Termination of the HAP Contract	HUD Waiver - PIH 2020-05	Regulatory	Termination	Allows PHA to extend the period of time after the last HAP payment is made before the HAP contract terminates automatically.	12/31/20	No, HUD defined
Fairfax County Housing and Redevelopment Authority	HCV-8 Utility Allowance Schedule: Required Review and Revision	HUD Waiver - PIH 2020-13	Regulatory	Utility Allowance	•Provides for delay in updating utility allowance schedule	12/31/20	
Fairfax County Housing and Redevelopment Authority	PH-9 Review and Revision of Utility Allowance	HUD Waiver - PIH 2020-13	Regulatory	Utility Allowance	•Provides for delay in updating utility allowance schedule	12/31/20	
Oakland Housing Authority	Utility Allowance Schedule	HUD Waiver - PIH 2020-05	Regulatory	Utility Allowances	Delayed update to utility allowance for both HQS and public housing until 12/31/2020	12/31/20	No
Fairfax County Housing and Redevelopment Authority	HCV-3 Term of Voucher: Extensions of Term	HUD Waiver - PIH 2020-13	Regulatory	Voucher Extension	•Allows PHAs to provide voucher extensions regardless of current PHA policy	12/31/20	
Home Forward (Portland)	Extensions of Term of Voucher	HUD Waiver - PIH 2020-05	Regulatory	Voucher Extension	If Participants are unable to find a unit in which to use their new voucher within 120 days, they will continue to get extensions to use it.		
Housing Authority of Champaign County, IL	Voucher Expiration	HUD Waiver - PIH 2020-05	Regulatory	Voucher Extension	HACC will be flexible with pending voucher expiration dates.	12/31/20	
Oakland Housing Authority	Extensions of Term of Voucher	HUD Waiver - PIH 2020-05	Regulatory	Voucher Extension	If Participants are unable to find a unit in which to use their new voucher within 120 days, they will continue to get 30 day extensions to use it.	Month to month	No
San Antonio Housing Authority	HCV-3 Term of Voucher – Extensions of Term	HUD Waiver - PIH 2020-05	Regulatory	Voucher Extension	• Allows PHAs to provide voucher extensions regardless of current PHA policy	12/31/20	No, HUD defined
San Antonio Housing Authority	HCV-3 Term of Voucher – Extensions of Term	HUD Waiver - PIH 2020-05	Regulatory	Voucher Extension	• Allows PHAs to provide voucher extensions regardless of current PHA policy	12/31/20	No, HUD defined
Fairfax County Housing and Redevelopment Authority	PH and HCV-7 Waiting List: Opening and Closing; Public Notice	HUD Waiver - PIH 2020-13	Regulatory, Subregulatory	Waiting List	•Waives public notice requirements for opening and closing waiting list •Requires alternative process	12/31/20	
Keene Housing	Waiting lists	HUD Waiver - PIH 2020-05		Waitlist	Applicants declining two apartment offers will not have their names removed from any waiting list	12/31/20	