

LORAIN METROPOLITAN HOUSING AUTHORITY OH-012
WAIVERS TEMPORARILY IMPLEMENTED AS A RESULT OF COVID-19

Summary of Public Housing and HCV Waivers and Alternative Requirements Pursuant to PIH Notice 2020-05 and 2020-13 Related to COVID-19

(Refer back to the Notice 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, 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 PHA implement waiver and alternative requirement?	Extensions of Availability Periods	Date of PHA adoption
PH and HCV-1 PHA 5-Year and Annual Plan	<u>Statutory Authority</u> Section 5A(a)(1), Section 5A(b)(1), Section 5A(g), Section 5A(h) <u>Regulatory Authority</u> § 903.5(a)(3), 903.5(b)(3), 903.21	<input type="checkbox"/> Alternative dates for submission <input type="checkbox"/> Changes to significant amendment process	<input type="checkbox"/> Varies based on FYE <input type="checkbox"/> 7/31/20	YES	12/31/2020	4/10/2020
PH and HCV-2 Family income and composition – delayed annual reexaminations	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> § 982.516(a)(1), § 960.257(a)	<input type="checkbox"/> Permits the PHA to delay the annual reexamination of income and family composition <input type="checkbox"/> HCV PHAs must implement HCV-7 for impacted families if they implement this waiver	<input type="checkbox"/> 12/31/20	NO	12/31/2020	
PH and HCV-3 Annual reexamination Income Verification	<u>Regulatory Authority</u> § 5.233(a)(2) Sub-regulatory Guidance PIH Notice 2018-18	<input type="checkbox"/> 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 <input type="checkbox"/> PHAs that implement this waiver will be responsible for addressing material income discrepancies that may arise later	<input type="checkbox"/> 7/31/20	YES	12/31/2020	4/10/2020

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PH and HCV-4 Interim reexaminations	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> § 5.233(a)(2), 982.516(c)(2), 960.257(b) and (d) <u>Sub-regulatory Guidance</u> PIH Notice 2018-18	<input type="checkbox"/> Waives the requirement to use the income verification requirements, including the use of EIV, for interim reexaminations	<input type="checkbox"/> 7/31/20	YES	12/31/2020	4/10/2020
PH and HCV-5 EIV System Monitoring	<u>Regulatory Authority</u> § 5.233 <u>Sub-regulatory Guidance</u>	<input type="checkbox"/> Waives the mandatory EIV monitoring requirements.	<input type="checkbox"/> 7/31/20	NO	12/31/2020	
PH and HCV-6 FSS Contract of Participation	<u>Regulatory Authority</u> § 984.303(d)	<input type="checkbox"/> Provides for extensions to FSS contract of participation	<input type="checkbox"/> 12/31/20	YES	N/A	4/10/2020
PH and HCV-7 Waiting List	<u>Regulatory Authority</u> § 982.206(a)(2) PIH Notice 2012-34	<input type="checkbox"/> Waives public notice requirements for opening and closing waiting list <input type="checkbox"/> Requires alternative process	<input type="checkbox"/> 7/31/20	YES	12/31/2020	4/10/2020
HQS-1 Initial inspection	<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), 982.405	<input type="checkbox"/> Changes initial inspection requirements, allowing for owner certification that there are no life-threatening deficiencies <input type="checkbox"/> Where self-certification was used, PHA must inspect the unit no later than October 31, 2020.	<input type="checkbox"/> 7/31/20	NO	12/31/2020	
			<input type="checkbox"/> 10/31/20	NO	12/31/2020	

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HQS-2: <u>PBV Pre-HAP Contract Inspections, PHA acceptance of completed units</u>	<u>Statutory Authority:</u> Section 8(o)(8)(A) <u>Regulatory Authority:</u> §§ 983.301(b), 983.156(a)(1)	<input type="checkbox"/> Changes inspection requirements, allowing for owner certification that there are no life-threatening deficiencies <input type="checkbox"/> Where self-certification was used, PHA must inspect the unit no later than October 31, 2020.	<input type="checkbox"/> 7/31/20	NO	12/31/2020	
			<input type="checkbox"/> 10/31/20	NO	12/31/2020	
HQS-3 Non-Life Threatening HQS - Initial Unit Approval	<u>Statutory Authority</u> Section 8(o)(8)(A)(ii) <u>Regulatory Authority</u> HOTMA HCV Federal Register Notice January 18, 2017	<input type="checkbox"/> Allows for extension of up to 30 days for owner repairs of non-life threatening conditions	<input type="checkbox"/> 7/31/20	NO	12/31/2020	
HQS-4 Initial HQS - Alternative Inspections	<u>Statutory Authority</u> Section 8(o)(8)(A)(iii) <u>Regulatory Authority</u> HOTMA HCV Federal Register Notice January 18, 2017	<input type="checkbox"/> Under Initial HQS Alternative Inspection Option - allows for commencement of assistance payments based on owner certification there are no life-threatening deficiencies <input type="checkbox"/> Where self-certification was used, PHA must inspect the unit no later than October 31, 2020.	<input type="checkbox"/> 7/31/20	NO	12/31/2020	
			<input type="checkbox"/> 10/31/20	NO	12/31/2020	
HQS-5 Biennial Inspections	<u>Statutory Authority</u> Section 8(o)(D) <u>Regulatory Authority</u> §§ 982.405(a), § 983.103(d)	<input type="checkbox"/> Allows for delay in biennial inspections <input type="checkbox"/> All delayed biennial inspections must be completed as soon as reasonably possible but by no later than October 31, 2020	<input type="checkbox"/> 10/31/20	YES	1 year after the date on which the biennial inspection would have been required in the absence of a waiver	4/10/2020

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HQS-6 Interim Inspections	<u>Statutory Authority</u> Section 8(o)(8)(F) <u>Regulatory Authority</u> §§ 982.405(g), § 983.103(e)	<input type="checkbox"/> Waives the requirement for the PHA to conduct interim inspection and requires alternative method <input type="checkbox"/> Allows for repairs to be verified by alternative methods	<input type="checkbox"/> 7/31/20	YES	12/31/2020	4/10/2020
HQS-7 PBV Turnover Inspections	<u>Regulatory Authority</u> § 983.103(e)	<input type="checkbox"/> Allows for PBV turnover units to be filled based on owner certification there are no life-threatening deficiencies <input type="checkbox"/> Allows for delayed full HQS inspection	<input type="checkbox"/> 7/31/20 <input type="checkbox"/> 10/31/20	NO	12/31/2020	
HQS-8: <u>PBV HAP Contract – HQS Inspections to Add or</u>	<u>Statutory Authority</u> Section 8(o)(8)(A) <u>Regulatory Authority</u> §§ 983.207(a), 983.207(b)	<input type="checkbox"/> Allows for PBV units to be added or substituted in the HAP contract based on owner certification there are no life-threatening deficiencies <input type="checkbox"/> Allows for delayed full HQS inspection	<input type="checkbox"/> 7/31/20 <input type="checkbox"/> 10/31/20	NO	12/31/2020	
HQS-9 HQS QC Inspections	<u>Regulatory Authority</u> § 982.405(b)	<input type="checkbox"/> Provides for a suspension of the requirement for QC sampling inspections	<input type="checkbox"/> 10/31/20	YES	12/31/2020	4/10/2020
HQS--10 HQS Space and Security	<u>Regulatory Authority</u> § 982.401(d)	<input type="checkbox"/> 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 notice, whichever is longer	NO	N/A	

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HQS-11 Homeownership HQS	<u>Statutory Authority</u> Section 8(o)(8)(A)(i), Section 8(y)(3)(B) <u>Regulatory Authority</u> § 982.631(a)	<input type="checkbox"/> Waives the requirement to perform an initial HQS inspection in order to begin making homeownership assistance payments <input type="checkbox"/> Requires family to obtain independent professional inspection	<input type="checkbox"/> 7/31/20	YES	12/31/2020	4/10/2020
HCV-1 Administrative Plan	<u>Regulatory Authority</u> § 982.54 (a)	<input type="checkbox"/> Waives the requirement to adopt revisions to the admin plan	<input type="checkbox"/> 7/31/20	YES	12/31/2020	4/10/2020
HCV-2 PHA Oral Briefing	<u>Regulatory Authority</u> § 982.301(a)(3) § 983.252(a)	<input type="checkbox"/> Waives the requirement for an oral briefing <input type="checkbox"/> Provides for alternative methods to conduct required voucher briefing	<input type="checkbox"/> 7/31/20	YES	12/31/2020	4/10/2020
HCV-3 Term of Voucher - Extensions of Term	<u>Regulatory Authority</u> § 982.303(b)(1)	<input type="checkbox"/> Allows PHAs to provide voucher extensions regardless of current PHA policy	<input type="checkbox"/> 7/31/20	YES	12/31/2020	4/10/2020
HCV-4 PHA Approval of Assisted Tenancy	<u>Regulatory Authority</u> § 982.305(c)	<input type="checkbox"/> Provides for HAP payments for contracts not executed within 60 days <input type="checkbox"/> PHA must not pay HAP to owner until HAP contract is executed	<input type="checkbox"/> 7/31/20	YES	12/31/2020	4/10/2020

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HCV-5 Absence from unit	<u>Regulatory Authority</u> § 982.312	<input type="checkbox"/> Allows for PHA discretion on absences from units longer than 180 days <input type="checkbox"/> PHAs must not make HAP payments beyond 12/31/20 for units vacant more than 180 consecutive days	<input type="checkbox"/> 12/31/20	NO	N/A	
HCV-6 Automatic Termination of the HAP Contract	<u>Regulatory Authority</u> § 982.455	<input type="checkbox"/> Allows PHA to extend the period of time after the last HAP payment is made before the HAP contract terminates automatically.	<input type="checkbox"/> 12/31/20	NO	N/A	
HCV-7 Increase in Payment Standard	<u>Regulatory Authority</u> § 982.505(c)(4)	<input type="checkbox"/> 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.	<input type="checkbox"/> 12/31/20	NO	N/A	
HCV-8 Utility Allowance Schedule	<u>Regulatory Authority</u> § 982.517	<input type="checkbox"/> Provides for delay in updating utility allowance schedule	<input type="checkbox"/> 12/31/20	NO	N/A	
HCV-9 Homeownership Counseling	<u>Statutory Authority</u> Section 8(y)(1)(D) <u>Regulatory Authority</u> § 982.630, 982.636(d)	<input type="checkbox"/> Waives the requirement for the family to obtain pre-assistance counseling	<input type="checkbox"/> 7/31/20	NO	12/31/2020	

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HCV-10 FUP Youth Age Eligibility to Enter HAP Contract	<u>Statutory Authority</u> Section 8(x)(2)	<input type="checkbox"/> Allows PHAs to increase age to 26 for foster youth initial lease up	<input type="checkbox"/> 12/31/20	YES	N/A	7/2/2020
HCV-11 FUP Length of Assistance for Youth	<u>Statutory Authority</u> Section 8(x)(2)	<input type="checkbox"/> 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	<input type="checkbox"/> 12/31/20	NO	N/A	
HCV-12 FUP Timeframe for Referral	<u>Statutory Authority</u> Section 8(x)(2)	<input type="checkbox"/> Allows PHAs to accept referrals of otherwise eligible youth who will leave foster care within 120 days	<input type="checkbox"/> 12/31/20	NO	N/A	
HCV-13 Homeownership: Maximum Term	<u>Regulatory Authority</u> § 982.634	<input type="checkbox"/> Allows PHAs to extend homeownership	<input type="checkbox"/> 12/31/20	YES	N/A	7/2/2020
HCV-14 Mandatory Removal of Unit from PBV Contract	<u>Regulatory Authority</u> § § 982.211 (a); 983.258	<input type="checkbox"/> 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	<input type="checkbox"/> 12/31/20	YES	N/A	
PH-1 Fiscal closeout of Capital Grant Fund	<u>Regulatory Authority</u> § 905.322(b)	<input type="checkbox"/> Extension of deadlines for ADCC and AMCC	Varies by PHA	YES	N/A	4/10/2020
PH-2 Total Development Costs	<u>Regulatory Authority</u> § 905.314(c)	<input type="checkbox"/> 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	NO	N/A	

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PH-3 Cost limitations	<u>Regulatory Authority</u> § 905.314(j)	<input type="checkbox"/> Allows for the use of force account labor for modernization activities in certain circumstances	<input type="checkbox"/> 12/31/20	NO	N/A	
PH-4 ACOP	<u>Regulatory Authority</u> § 960.202(c)(1)	<input type="checkbox"/> Changes to approval process for ACOP	<input type="checkbox"/> 7/31/20	YES	12/31/2020	4/10/2020
PH-5 CSSR	<u>Statutory Authority</u> Section 12(c) <u>Regulatory Authority</u> § 960.603(a) and 960.603(b)	<input type="checkbox"/> Temporarily suspends CSSR	<input type="checkbox"/> 3/31/21	YES	N/A	4/10/2020
PH-6 Energy Audits	<u>Regulatory Authority</u> § 965.302	<input type="checkbox"/> Allows for delay in due dates of energy audits	One year beyond 2020 audit deadline	NO	N/A	
PH-7 Over-income families	HOTMA Act of 2016 Implementation of the Public Housing Income Limit 83 FR 35490 Notice: Notice PIH 2019-11	<input type="checkbox"/> Changes to timeframes for determination of over-income	<input type="checkbox"/> 12/31/20	NO	N/A	
PH-8 Resident Council Elections	<u>Regulatory Authority</u> § 964.130(a)(1)	<input type="checkbox"/> Provides for delay in resident council elections	<input type="checkbox"/> 7/31/20	YES	12/31/2020	4/10/2020
PH-9 Utility Allowance	<u>Regulatory Authority</u> § 965.507	<input type="checkbox"/> Provides for delay in updating utility allowance schedule	<input type="checkbox"/> 12/31/20	NO	N/A	
PH-10 Tenant notifications	<u>Regulatory Authority</u> § 966.5	<input type="checkbox"/> Advance notice not required except for policies related to tenant charges	<input type="checkbox"/> 7/31/20	YES	12/31/2020	4/10/2020

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PH-11 Designated Housing Plan Renewals	<u>Statutory Authority</u> Section 7 (f)	<input type="checkbox"/> 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	<input type="checkbox"/> 12/31/20	NO	N/A	
PH-12 Public Housing Agency Annual Self-Inspections	<u>Statutory Authority: Section 6(f)(3)</u> <u>Regulatory Authority</u> § 902.20(d)	<input type="checkbox"/> Waives the requirement that the PHA must inspect each project	<input type="checkbox"/> 12/31/20	NO	N/A	
11a PHAS	<u>Statutory Authority</u> 6(f)(3) <u>Regulatory Authority</u> 24 CFR Part 902	<input type="checkbox"/> Allows for alternatives related to inspections <input type="checkbox"/> PHA to retain prior year PHAS score unless requests otherwise	HUD will resume issuing new PHAS scores starting with PHAs with FYE dates of 3/31/21	YES	N/A	4/10/2020
11b SEMAP	<u>Regulatory Authority</u> 24 CFR Part 985	<input type="checkbox"/> PHA to retain prior year SEMAP score unless requests otherwise	HUD will resume issuing new SEMAP scores starting with PHAs with FYE dates of 3/31/21	YES	N/A	4/10/2020
11c Financial reporting	<u>Regulatory Authority</u> §§ 5.801(c), 5.801(d)(1)	<input type="checkbox"/> Allows for extensions of financial reporting deadlines	Varies by PHA FYE	NO	N/A	
12a Form HUD 50058	<u>Regulatory Authority</u> 24 CFR Part 908, § 982.158 <u>Sub-regulatory Guidance</u> PIH Notice 2011-65	<input type="checkbox"/> Waives the requirement to submit 50058 within 60 days <input type="checkbox"/> Alternative requirement to submit within 90 days of the effective date of action	<input type="checkbox"/> 12/31/20	NO	N/A	

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12b Designated housing plan	<u>Statutory Authority</u> Section 7(e)(1)	<input type="checkbox"/> Allows for HUD to delay notification about designated housing plan	<input type="checkbox"/> 7/31/20	NO	N/A	
12c Deadline for reporting Operating and Capital Fund expenditures	<u>Statutory Authority</u> Section 9(j) <u>Regulatory Authority</u> § 905.306(d)(5)			One-year extension, however, no programmatic expenditure end date shall be extended beyond one month prior to closure of relevant appropriations acc	NA HUD automatically extended all obligation and expenditure date by one year	