

Due to COVID-19, the Department of Housing and Urban Development (HUD) has allowed Public Housing Authorities (PHAs) like the CDA the ability to apply statutory waivers as a way to continue operating and providing critical housing services to you outside of the normal statutory and regulatory requirements set by Congress. The CDA is notifying all Section 8 voucher holders of the waivers we are taking. We have outlined these waivers that apply to you and provided a brief description of how this waiver impacts you.

More information about these waivers can be found in [PIH Notice 2020-05](#) and [PIH Notice 2020-13](#).

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Effective Date (Date of CDA Adoption)	How this Impacts CDA Voucher Holders
PH and HCV-1 PHA 5-Year and Annual Plan	<p><u>Statutory Authority</u> Section 5A(a)(1), Section 5A(b)(1), Section 5A(g), Section 5A(h)</p> <p><u>Regulatory Authority</u> § 903.5(a)(3), 903.5(b)(3), 903.21</p>	<ul style="list-style-type: none"> <li>Alternative dates for submission</li> <li>Changes to significant amendment process</li> </ul>	<ul style="list-style-type: none"> <li>Varies based on FYE</li> <li>12/31/20</li> </ul>	04/10/2020	The deadline for input from voucher holders to submit comments on the CDA’s 5-Year Plan will be extended.
PH and HCV-3 Annual reexamination Income Verification	<p><u>Regulatory Authority</u> § 5.233(a)(2)</p> <p><u>Sub-regulatory Guidance</u> PIH Notice 2018-18</p>	<ul style="list-style-type: none"> <li>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</li> <li>PHAs that implement this waiver will be responsible for addressing material income discrepancies that may arise later</li> </ul>	<ul style="list-style-type: none"> <li>12/31/20</li> </ul>	04/10/2020	For annual re-exams, CDA staff can use self-certification as a way to verify your income changes. However, if you do not report the income accurately the CDA will address these discrepancies in the future and you could be responsible for back rent payments. It is your responsibility to correctly report income changes.
PH and HCV-4 Interim reexaminations	<p><u>Statutory Authority</u> Section 3(a)(1)</p> <p><u>Regulatory Authority</u> § 5.233(a)(2), 982.516(c)(2), 960.257(b) and (d)</p> <p><u>Sub-regulatory Guidance</u> PIH Notice 2018-18</p>	<ul style="list-style-type: none"> <li>Waives the requirement to use the income verification requirements, including the use of EIV, for interim reexaminations</li> </ul>	<ul style="list-style-type: none"> <li>12/31/20</li> </ul>	04/10/2020	If your income changes, you should continue to contact your management office to report that change. CDA staff can waive income verification requirements.

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Effective Date (Date of CDA Adoption)	How this Impacts CDA Voucher Holders
PH and HCV-5 EIV System Monitoring	<u>Regulatory Authority</u> § 5.233  <u>Sub-regulatory Guidance</u> PIH Notice 2018-18	<ul style="list-style-type: none"> <li>• Waives the mandatory EIV monitoring requirements.</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/20</li> </ul>	04/10/2020	This does not affect the voucher holders.
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	<ul style="list-style-type: none"> <li>• Changes initial inspection requirements, allowing for owner certification that there are no life-threatening deficiencies</li> <li>• Where self-certification was used, PHA must inspect the unit no later than the 1-year anniversary date of the owner’s certification.</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/20</li> <li>• 1-year anniversary date of owner’s certification</li> </ul>	04/10/2020	Voucher holders may lease occupied units that CDA will not inspect until after move in if the owner certifies that they have no knowledge of any life-threatening condition in the unit. CDA will perform a confirmatory inspection on such units before the 1-year anniversary date of the owner’s certification.
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)	<ul style="list-style-type: none"> <li>• Changes inspection requirements, allowing for owner certification that there are no life-threatening deficiencies</li> <li>• Where self-certification was used, PHA must inspect the unit no later than the 1-year anniversary date of the owner’s certification.</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/20</li> <li>• 1-year anniversary date of owner’s certification</li> </ul>	04/10/2020	No new PBV contracts are set to begin during the availability of this waiver.
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	<ul style="list-style-type: none"> <li>• Allows for extension of up to 30 days for owner repairs of non-life threatening conditions</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/20</li> </ul>	04/10/2020	In cases where CDA conducts an initial move-in inspection, voucher holder will be allowed to begin tenancy and the CDA will enter into a HAP contract with the owner with the understanding that non-life-threatening repairs must be completed within 30 days.
HQS-5 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"> <li>• Allows for delay in biennial inspections</li> <li>• All delayed biennial inspections must be completed as soon as reasonably possible but by no later 1 year after the date on which the biennial inspection</li> </ul>	<ul style="list-style-type: none"> <li>• 10/31/20</li> <li>• 1 year after the date on which the biennial inspection would have</li> </ul>	04/10/2020	Biennial inspections that are due to be completed will be delayed during the crisis but will be conducted within 1 year after the date on which the biennial inspection would have been required if this waiver was not accepted.

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Effective Date (Date of CDA Adoption)	How this Impacts CDA Voucher Holders
		would have been required absent the waiver.	been required absent the waiver		
HQS-6 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"> <li>• Waives the requirement for the PHA to conduct interim inspection and requires alternative method</li> <li>• Allows for repairs to be verified by alternative methods</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/20</li> </ul>	04/10/2020	Voucher holders who request an interim inspections for failed HQS items may submit evidence of the failed item. CDA will verify that repairs are complete by tenant certification or photographic evidence from the landlord.
HQS-7 PBV Turnover Inspections	<u>Regulatory Authority</u> § 983.103(c)	<ul style="list-style-type: none"> <li>• Allows for PBV turnover units to be filled based on owner certification there are no life-threatening deficiencies</li> <li>• Allows for delayed full HQS inspection NLT than 1-year anniversary of date of owner’s certification.</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/20</li> <li>• 1-year anniversary of date of owner’s certification</li> </ul>	04/10/2020	PBV program participants may accept occupied PBV units that CDA will not inspect until after move in if the owner certifies that they have no knowledge of any life-threatening condition in the unit. CDA will perform a confirmatory inspection on such units before the 1-year anniversary date of the owner’s certification.
HQS-8: <u>PBV HAP Contract – HQS Inspections to Add or Substitute Units</u>	<u>Statutory Authority</u> Section 8(o)(8)(A) <u>Regulatory Authority</u> §§ 983.207(a), 983.207(b)	<ul style="list-style-type: none"> <li>• Allows for PBV units to be added or substituted in the HAP contract based on owner certification there are no life-threatening deficiencies</li> <li>• Allows for delayed full HQS inspection</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/20</li> <li>• 1-year anniversary of date of owner’s certification</li> </ul>	04/10/2020	Some PBV units may be substituted and occupied without initial HQS inspections but will be inspected before the 1-year anniversary date of the owner’s certification.
HQS-9 HQS QC Inspections	<u>Regulatory Authority</u> § 982.405(b)	<ul style="list-style-type: none"> <li>• Provides for a suspension of the requirement for QC sampling inspections</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/20</li> </ul>	04/10/2020	No QC inspections will be conducted. No SEMAP score will be issued for 2020.
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)	<ul style="list-style-type: none"> <li>• Waives the requirement to perform an initial HQS inspection in order to begin making homeownership assistance payments</li> <li>• Requires family to obtain independent professional inspection</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/20</li> </ul>	04/10/2020	S8 homebuyers will be able to move in with one independent home inspection and no HQS inspection by CDA.

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Effective Date (Date of CDA Adoption)	How this Impacts CDA Voucher Holders
HCV-1 Administrative Plan	<u>Regulatory Authority</u> § 982.54 (a)	<ul style="list-style-type: none"> <li>Establishes an alternative requirement that policies may be adopted without board approval.</li> <li>Any provisions adopted informally must be adopted formally NLT December 31, 2020.</li> </ul>	<ul style="list-style-type: none"> <li>9/30/20</li> <li>12/31/2020</li> </ul>	04/10/2020	No direct impact on voucher holders.
HCV-2 PHA Oral Briefing	<u>Regulatory Authority</u> § 982.301(a)(3) § 983.252(a)	<ul style="list-style-type: none"> <li>Waives the requirement for an oral briefing</li> <li>Provides for alternative methods to conduct required voucher briefing</li> </ul>	<ul style="list-style-type: none"> <li>12/31/20</li> </ul>	04/10/2020	Voucher briefings will be conducted by phone or online to maintain social distancing.
HCV-3 Term of Voucher - Extensions of Term	<u>Regulatory Authority</u> § 982.303(b)(1)	<ul style="list-style-type: none"> <li>Allows PHAs to provide voucher extensions regardless of current PHA policy</li> </ul>	<ul style="list-style-type: none"> <li>12/31/20</li> </ul>	04/10/2020	Some voucher holders will receive extensions to their voucher terms as exceptions to current CDA policy.
HCV-10 FUP	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> <li>Allows PHAs to increase age to 26 for foster youth initial lease up</li> </ul>	<ul style="list-style-type: none"> <li>12/31/20</li> </ul>	04/10/2020	Some additional FUP youth referrals may receive vouchers
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"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>12/31/2020</li> </ul>	07/02/2020	FUP youth who reach their 36-month limit between April 10, 2020 and December 31, 2020 will not be terminated.
HCV-12 Family Unification Program (FUP): Timeframe for Referral	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> <li>Allows PHAs to accept referrals of otherwise eligible youth who will leave foster care within 120 days.</li> </ul>	<ul style="list-style-type: none"> <li>12/31/2020</li> </ul>	07/02/2020	The CDA will accept referrals for foster care youth who will leave foster care within 120 days.

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Effective Date (Date of CDA Adoption)	How this Impacts CDA Voucher Holders
HCV-13 Homeownership: Maximum Term of Assistance	<u>Regulatory Authority</u> § 982.634(a)	<ul style="list-style-type: none"> <li>Allows a PHA to extend homeownership assistance for up to 1 additional year.</li> </ul>	<ul style="list-style-type: none"> <li>12/31/2020</li> </ul>	07/02/2020	Section 8 homeowners who are reaching their maximum term of assistance will have their voucher term extended for up to 1 additional year.
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"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>12/31/2020</li> </ul>	07/02/2020	This waiver has no direct impact on voucher holders.
11b SEMAP	<u>Regulatory Authority</u> 24 CFR Part 985	<ul style="list-style-type: none"> <li>PHA to retain prior year SEMAP score unless requests otherwise</li> </ul>	HUD will resume issuing new SEMAP scores starting with PHAs with FYE dates of 3/31/21	04/10/2020	N/A
11c Uniform Financial Reporting Standards: Filing of Financial Report; Reporting Compliance Dates	<u>Regulatory Authority</u> §§ 5.801(c), 5.801(d)(1)	<ul style="list-style-type: none"> <li>Allows for extensions of financial reporting deadlines</li> </ul>	Varies by PHA FYE	04/10/2020	No direct impact on voucher holders.
12b Designated Housing Plans: HUD 60-Day Notification	<u>Statutory Authority</u> Section 7(e)(1)	<ul style="list-style-type: none"> <li>Allows for HUD to delay notification about designated housing plan</li> </ul>	<ul style="list-style-type: none"> <li>7/31/20</li> </ul>	04/10/2020	N/A