

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 Public Housing residents 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 Residents
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 CDA residents 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	<ul style="list-style-type: none"> <li>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.</li> </ul>
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	<ul style="list-style-type: none"> <li>If your income changes, you should continue to contact your management office to report that change. CDA staff can waive income verification requirements.</li> </ul>

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PH-1 Fiscal closeout of Capital Grant Funds	<u>Regulatory Authority § 905.322(b)</u>	<ul style="list-style-type: none"> <li>Extension of deadlines for ADCC and AMCC</li> </ul>	Varies by PHA	04/10/2020	<ul style="list-style-type: none"> <li>This waiver extends reporting deadlines for the CDA Capital Grant.</li> </ul>
PH-5 CSSR	<u>Statutory Authority Section 12(c)</u>  <u>Regulatory Authority § 960.603(a) and 960.603(b)</u>	<ul style="list-style-type: none"> <li>Temporarily suspends CSSR</li> </ul>	<ul style="list-style-type: none"> <li>3/31/21</li> </ul>	04/10/2020	<ul style="list-style-type: none"> <li>Temporary suspension of the Community Service and Self-Sufficiency Requirement (CSSR). Residents are not subject to this requirement until their next annual re-exam.</li> </ul>
PH-6 Energy Audits	<u>Regulatory Authority § 965.302</u>	<ul style="list-style-type: none"> <li>Allows for delay in due dates of energy audits</li> </ul>	One year beyond 2020 audit deadline	04/10/2020	<ul style="list-style-type: none"> <li>The CDA is required to submit an energy every 5 years. This waiver extends the deadline until 2021.</li> </ul>
PH-7 Over-income families	Housing Opportunity Through Modernization Act of 2016: Final Implementation of the Public Housing Income Limit 83 FR 35490 Notice: Notice PIH 2019-11	<ul style="list-style-type: none"> <li>Changes to timeframes for determination of over-income</li> </ul>	<ul style="list-style-type: none"> <li>12/31/20</li> </ul>	04/10/2020	<ul style="list-style-type: none"> <li>The CDA is required to terminate or charge an alternative rent to families who are over income for 2 consecutive years. PHA's HUD is waiving this requirement, permitting families to remain in their units and to continue to pay the same rental amount until the next annual re-exam.</li> </ul>
PH-9 Review and Revision of Utility Allowance	<u>Regulatory Authority § 965.507</u>	<ul style="list-style-type: none"> <li>Provides for delay in updating utility allowance schedule</li> </ul>	<ul style="list-style-type: none"> <li>12/31/20</li> </ul>	04/10/2020	<ul style="list-style-type: none"> <li>This waiver extends the deadline for the CDA to submit utility allowance reviews to HUD. The CDA is continuing to work on updating the utility allowance schedule.</li> </ul>
PH-10 Tenant notifications for Changes to Project Rules and Regulations	<u>Regulatory Authority § 966.5</u>	<ul style="list-style-type: none"> <li>Advance notice not required except for policies related to tenant charges</li> </ul>	<ul style="list-style-type: none"> <li>12/31/20</li> </ul>	04/10/2020	<ul style="list-style-type: none"> <li>Since many policies are impacted by covid, the CDA will continue to provide notice to residents (such as this notice) and must be provided within 30 days of making changes.</li> </ul>

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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"> <li>• Waives the requirement that the PHA must inspect each project.</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/20</li> </ul>	07/02/20020	<ul style="list-style-type: none"> <li>• The CDA will not conduct routine annual inspections in 2020.</li> </ul>