

Minnesota NAHRO

2020 Virtual Conference

Washington Update

May 20, 2020



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Georgi Banna

Director of Policy and Program Development



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TODAY'S AGENDA

<p>CONGRESSIONAL RESPONSE TO COVID-19</p>	<p>HUD WAIVERS</p>	<p>REMOTE VIDEO INSPECTIONS (RVI)</p>						
<p>PUBLIC HOUSING ELIGIBLE USES</p>	<p>HCV ADMIN FEE ELIGIBLE USES</p>	<p>NAHRO POLICY & ADVOCACY CONTACT INFORMATION</p> <table border="0"> <tr> <td>Georgi Banna, Esq. Director of Policy and Program Development gbanna@nahro.org</td> <td>Tess Membree Director of Congressional Relations themembree@nahro.org</td> </tr> <tr> <td colspan="2" style="text-align: center;">www.nahroblog.org</td> </tr> <tr> <td>www.nahro.org/coronavirus</td> <td>www.nahro.org/advocacy</td> </tr> </table>	Georgi Banna, Esq. Director of Policy and Program Development gbanna@nahro.org	Tess Membree Director of Congressional Relations themembree@nahro.org	www.nahroblog.org		www.nahro.org/coronavirus	www.nahro.org/advocacy
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www.nahro.org/coronavirus	www.nahro.org/advocacy							

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CONGRESSIONAL RESPONSE TO COVID-19

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HEROES ACT

Health and Economic
Recovery Omnibus
Emergency Solutions
Act

Drafted by House
Democrats, not
negotiated with
Senate Republicans
or White House

House passed the
HEROES Act on
Friday, May 15

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HEROES ACT FUNDING



- Housing Choice Voucher – \$4 billion
 - \$500 million Admin Fees
 - \$2.5 billion for CY2020 HAP
 - \$1 billion for New Vouchers – homeless or near homeless or domestic violence
- Public Housing Operating Fund – \$2 billion
- CDBG – \$5 billion
- ESG – \$11.5 billion
- PBRA – \$750 million
- Emergency Rental Assistance - \$100 billion

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HEREOSACT EVICTION MORATORIUM

12 Month from enactment of HEROES Act

Eviction applies to all residential rental situations (lease or no lease) in any building.

Foreclosure applies to any credit transaction for a 1- to 4-unit dwelling.

Forbearance on Escrow Accounts – Servicer shall pay or advance fund to make timely disbursements

CARES ACT

Coronavirus Aid, Relief, and Economic Security Act

Enacted on March 27, 2020

EVICTIION MORATORIUM

120-Day Eviction
Moratorium – Expires
July 24, 2020

30-Day Notice to Vacate
issued after July 24, 2020

Non-Payment of Rent
fees, charges, late fees or
penalties can be charged

Applies to: Public Housing, Housing
Choice Vouchers, Low-Income Housing
Tax Credit units, rural housing assistance,
and other programs as defined by the
Violence Against Women Act

Only applies to non-payment of rent
matters

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PUBLIC HOUSING FUNGIBILITY

Public Housing
Operating Fund
and Capital Fund

Available through
December 31,
2020

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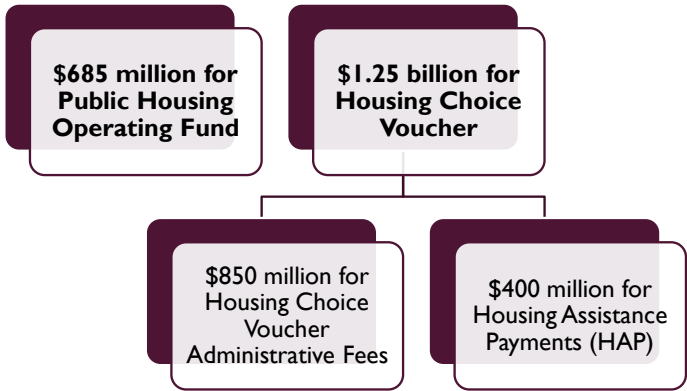
HUD WAIVER AUTHORITY

**Statutory and
Regulatory Waiver
Authority**

**Focuses on
Housing Choice
Voucher program
and Public Housing**

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CARES ACT - FUNDING



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HUD WAIVERS

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HOW TO ADOPT FLEXIBILITIES IN PIH NOTICE 2020-05

The use of waivers is at the discretion of the PHA.

PHAs may choose to apply all, some, or none of the waivers. Some of the waivers require the use of alternative requirements.

- If a waiver is adopted and has an alternative requirement, it should be read carefully as some alternative requirements are written simply as a “floor” and others are mandatory.

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HOW TO ADOPT FLEXIBILITIES IN PIH NOTICE 2020-05

PHAs do not need to notify HUD or receive approval to begin using waivers/alternative requirements.

- HUD may subsequently require PHAs to report on waivers utilized (see attachments at end of notice).

PHAs must notify residents and owners of any impacts that waivers and alternative requirements, where applicable, as soon as practicable.

- Encourage agencies to adapt their communications in consideration of local conditions and resources.

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WAIVER AVAILABILITY PERIOD

Waivers and alternative requirements are available for immediate use by PHAs.

HUD provides a “period of availability” – a date through which the waivers and alternative requirements are effective.

PHAs are not required to keep the waiver/ alternative requirement in-place for the full period of availability (including any extension) but may at any time choose to revert to regular program requirements and operations.

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PHAS AND SEMAP

Waiver Summary	References	Page Number
<ul style="list-style-type: none"> • HUD will carry forward 2019 Public Housing Assessment System (PHAS) and Section Eight Management Assessment System (SEMAP) scores for 2020 unless the PHA requests that a score be issued • HUD will begin re-scoring PHAs with a fiscal year end of 3/31/21 	<ul style="list-style-type: none"> • Section 5A(a)(1), Section 5A(b)(1), Section 5A(g), Section 5A(h) of 1937 United States Housing Act (USHA) • 24 CFR § § 903.5(a)(3), 903.5(b)(3), 903.21 	27-28

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REPORTING WAIVERS

Waiver Summary		Page Number									
Extension of time period for Annual/5-Year Plan and significant amendment submissions		6									
<table border="1"> <thead> <tr> <th data-bbox="188 1476 491 1537">PHA FYE</th> <th data-bbox="494 1476 782 1537">Revised Submission Requirement</th> <th data-bbox="785 1476 1066 1537">Revised Due Date</th> </tr> </thead> <tbody> <tr> <td data-bbox="188 1541 491 1566">6/30/20 and 9/30/20</td> <td data-bbox="494 1541 782 1566">75 days before 1/1/21</td> <td data-bbox="785 1541 1066 1566">10/18/20</td> </tr> <tr> <td data-bbox="188 1570 491 1595">12/31/20</td> <td data-bbox="494 1570 782 1595">75 days before 4/1/21</td> <td data-bbox="785 1570 1066 1595">1/16/21</td> </tr> </tbody> </table>			PHA FYE	Revised Submission Requirement	Revised Due Date	6/30/20 and 9/30/20	75 days before 1/1/21	10/18/20	12/31/20	75 days before 4/1/21	1/16/21
PHA FYE	Revised Submission Requirement	Revised Due Date									
6/30/20 and 9/30/20	75 days before 1/1/21	10/18/20									
12/31/20	75 days before 4/1/21	1/16/21									

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HCV-I, PH-4 ADMIN PLAN AND ACOP

Waiver Summary	References	Page Number
<ul style="list-style-type: none"> • PHA administrative plans and ACOPs may be revised on a temporary basis without Board approval. • Informally adopted revisions under this waiver authority must be formally adopted as soon as practicable following June 30, 2020, but no later than July 31, 2020. 	<ul style="list-style-type: none"> • 24 CFR § 982.54 (a), 960.202(c) 	19 and 24

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REPORTING WAIVERS

Waiver Summary	Page Number																											
<p>Extension for submission of audited and unaudited financial statements</p> <table border="1" data-bbox="247 1412 1005 1702"> <thead> <tr> <th>FYE</th> <th>Due Date</th> <th>Extended Due Date</th> </tr> </thead> <tbody> <tr> <td colspan="3" style="text-align: center;">Audited</td> </tr> <tr> <td>6/30/2019</td> <td>3/31/2020</td> <td>9/30/2020</td> </tr> <tr> <td>9/30/2019</td> <td>6/30/2020</td> <td>12/31/2020</td> </tr> <tr> <td>12/31/2019</td> <td>9/30/2020</td> <td>3/31/2021</td> </tr> <tr> <td>3/31/2020</td> <td>12/31/2020</td> <td>6/20/2021</td> </tr> <tr> <td colspan="3" style="text-align: center;">Unaudited</td> </tr> <tr> <td>12/31/2019</td> <td>2/29/2020</td> <td>8/31/2020</td> </tr> <tr> <td>3/31/2020</td> <td>5/31/2020</td> <td>11/30/2020</td> </tr> </tbody> </table>	FYE	Due Date	Extended Due Date	Audited			6/30/2019	3/31/2020	9/30/2020	9/30/2019	6/30/2020	12/31/2020	12/31/2019	9/30/2020	3/31/2021	3/31/2020	12/31/2020	6/20/2021	Unaudited			12/31/2019	2/29/2020	8/31/2020	3/31/2020	5/31/2020	11/30/2020	30
FYE	Due Date	Extended Due Date																										
Audited																												
6/30/2019	3/31/2020	9/30/2020																										
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Unaudited																												
12/31/2019	2/29/2020	8/31/2020																										
3/31/2020	5/31/2020	11/30/2020																										

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REPORTING WAIVERS

Waiver Summary	Page Number
HUD is waiving the mandatory EIV monitoring requirements through July 31, 2020	10
Extension HUD is extending the time period PHAs must submit 50058 transactions to PIC from 60 days to 90 days	29

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PH AND HCV – 2: ANNUAL REEXAMINATIONS: OPTION I

Waiver Summary	References	Page Number
<ul style="list-style-type: none"> PHAs may delay annual reexaminations All delayed annual reexaminations must be completed no later than 12/31/20 	<ul style="list-style-type: none"> Section 3(a)(1) of the USHA of 1937 24 CFR § 982.516(a)(1), § 960.257(a) 	8

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PH AND HCV – 3: ANNUAL REEXAMINATIONS: OPTION 2

Waiver Summary	References	Page Number
<ul style="list-style-type: none"> • PHAs may continue to conduct on-time annual reexaminations by opting to streamline income verification requirements through 7/31/20 <ul style="list-style-type: none"> • PHAs may consider self-certification the highest form of income verification • Verification could occur over phone, through an email with a self-certification form by the family, or through other electronic communication 	<ul style="list-style-type: none"> • 24 CFR § 5.233(a)(2), • PIH Notice 2018-18 	8

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PH AND HCV – 4: INTERIM EXAMINATIONS

Waiver Summary	References	Page Number
<p>Through 7/31/20, PHAs may consider self-certification as the highest form of income verification to process interim reexaminations.</p> <ul style="list-style-type: none"> • PHAs may consider self-certification the highest form of income verification • Verification could occur over phone, through an email with a self-certification form by the family, or through other electronic communication 	<ul style="list-style-type: none"> • Section 3(a)(1) of the USHA of 1937 • 24 CFR § 982.516(c)(2) § 960.257(b) and (d) § 5.233(a)(2), • PIH Notice 2018-18 	9

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REPORTING WAIVERS

Waiver Summary	Page Number
<p>Extension of 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</p> <ul style="list-style-type: none"> The expenditure end date cannot be extended beyond one month prior to the closure of the relevant appropriation account. 	30
<p>Deadline extension for an ADCC or AMCC that fell between March 1, 2020, and September 30, 2020, by 6 months</p>	23

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PH-2: TOTAL DEVELOPMENT COSTS

Waiver Summary	Reference	Page Number
<ul style="list-style-type: none"> HUD is waiving the TDC and HCC limits to allow the amount of Public Housing Funds committed to development of a project to exceed the applicable TDC and HCC limits by 25% without a waiver from HUD. <ul style="list-style-type: none"> Amounts in excess of 25% up to 50% may be approved by the HUD program office on a case-by-case basis, if sufficient justification is provided. This waiver applies to public housing development, Mixed-Finance development and Choice Neighborhoods All other requirements of development set forth in 24 CFR § 905.600 still apply 	<ul style="list-style-type: none"> 24 CFR § 905.314(c) 	23

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HQS

HQS Waivers and Alternative Requirements (pages 12-19)

HQS-1: Initial Inspection Requirements	HQS-7 PBV Turnover Unit Inspections
HQS-2 Project Based Voucher (PBV) Pre-HAP Contract Inspections	HQS-8 PBV HAP Contract
HQS-3: Initial Inspection Non-Life Threatening Deficiency Options	HQS-9 HQS QC Inspections
HQS-4 Initial Inspection – Alternative Inspection Option	HQS-10 Space and Security
HQS-5 Biennial Inspections	HQS-11 Homeownership
HQS-6 – HQS Interim Inspections	

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HQS-1: INITIAL INSPECTIONS

Waiver Summary	References	Page Number
<ul style="list-style-type: none"> Instead of conducting an initial inspection, PHAs may place units under HAP contract by relying on the owner's certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist in the unit <ul style="list-style-type: none"> At minimum the PHA must require this owner certification but may add other requirements or conditions. PHA must conduct an HQS inspection on the unit as soon as reasonably possible but no later than October 31, 2020. 	<ul style="list-style-type: none"> Section 8(o)(8)(A)(i), Section 8(o)(8)(C), 24 CFR § 982.305(a), 982.305(b), 982.405 	12

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HQS-5: BIENNIAL INSPECTIONS

Waiver Summary	References	Page Number
<ul style="list-style-type: none"> PHAs may delay biennial inspections for both tenant-based and PBV units. All delayed biennial inspections must be completed as soon as reasonably possible but no later than October 31, 2020. 	<ul style="list-style-type: none"> Section 8(o)(D) 24 CFR 982.405(a), 983.103(d) 	15

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HQS-6: INTERIM INSPECTIONS

Waiver Summary	References	Page Number
<ul style="list-style-type: none"> HUD is waiving the requirement that PHAs must inspect units with reported life-threatening conditions within 24 hours or other conditions within 15 days and establishing these alternative requirements: <ul style="list-style-type: none"> For life-threatening deficiencies, PHA must notify the owner of the reported life-threatening deficiency and owner must either correct the life-threatening deficiency within 24 hours of the PHA notification or provide documentation (e.g., text or email a photo to the PHA) that the reported deficiency does not exist. For non-life-threatening deficiencies, PHA must notify the owner of the reported deficiency within 30 days and the owner must either make the repair or document that the deficiency does not exist within 30 days 	<ul style="list-style-type: none"> Section 8(o)(8)(F) 24 CFR §§ 982.405(g), 983.103(e) 	16

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HCV-10: FAMILY UNIFICATION PROGRAM & FOSTER YOUTH TO INDEPENDENCE

Waiver Summary	References	Page Number
<ul style="list-style-type: none"> PHAs may execute a HAP contract on behalf of any otherwise eligible FUP youth not more than 25 years of age (not yet reached their 26th birthday). 	Section 8(x)(2)	23

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OTHER HCV WAIVERS

Waiver Summary	Page Number
PHAs may conduct briefing by other means such as a webcast, video call, or expanded information packet through July 31, 2020	19
PHAs may make changes to voucher extensions even though it has been unable to formally amend its policy in the administrative plan through July 31, 2020	20

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OTHER HCV WAIVERS

Waiver Summary	Page Number
PHAs may continue HAP when a family is absent from the unit more than 180 due to extenuating circumstances through 12/31/20	20
PHAs may execute HAP contract after 60 days and make housing assistance payments back to the beginning of the lease term. HAP contract must be executed no later than 120 days from the beginning of the lease term through 7/31/20	20
PHAs may extend the period of time following the last payment to the owner that triggers the automatic termination of the HAP contract through 12/31/20	21

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OTHER HCV WAIVERS

Waiver Summary	Page Number
PHAs may apply the increased payment standard at any time after the effective date of the increase in the payment standard amount, provided the increased payment standard is used to calculate the HAP no later than the effective date of the family's first regular reexamination following the change through 12/31/2020	21
PHAs may permit the family to purchase the home without fulfilling the normally applicable pre-assistance homeownership counseling requirements through 7/31/20	22

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OTHER PH AND HCV WAIVERS

Waiver Summary	Page Number
PHAs that open their waiting list between now and 7/31/20 may provide public notice in a voicemail message on its main or general information telephone number and through its website	11
Through 12/31/20, PHAs may consider the circumstances surrounding COVID-19 as good cause to extend FSS contracts of participation	11
Any review and update of utility allowances that were due at some point in time in CY 2020 must be completed by the end of 2020	22, 26

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PH-5: COMMUNITY SERVICE

Waiver Summary	References	Page Number
<ul style="list-style-type: none"> HUD is waiving this requirement and is alternatively suspending the community service and self-sufficiency requirement. <ul style="list-style-type: none"> If a PHA adopts this waiver, families will not be subject to this requirement until the family's next annual reexamination. Upon the family's next annual reexamination, PHAs should report on Form HUD-50058 each individual's CSSR status as either exempt for those that are exempt or pending for those that are otherwise eligible but for which the suspension prevents a housing authority from determining compliance. 	Section 12(c) of 1937 USHA, 24 CFR § 960.603(a) and 960.603(b)	25

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PH-7: OVER-INCOME FAMILIES

Waiver Summary	References	Page Number
<ul style="list-style-type: none"> • PHAs are required to terminate or charge an alternative rent to families whose income exceeds the program maximum income level for two consecutive years. <ul style="list-style-type: none"> • HUD defined the two-year time period as two consecutive reexamination cycles. • In order to be consistent with the delay in annual reexaminations permitted under waiver PH and HCV-2 HUD is waiving this requirement and is permitting such families to remain in their units until such time that a PHA conducts the next annual income recertification that would impact the family. 	<ul style="list-style-type: none"> • Section 16(a)(5) of the USHA of 1937 • HOTMA- Implementation of the Public Housing Income Limit (83 FR 35490, July 26, 2018) • Notice PIH 2019-11 	26

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PUBLIC HOUSING WAIVERS

Waiver Summary	References	Page Number
<p>HUD will waive this requirement to allow for the use of force account labor for modernization activities even if this activity has not been included in the non-high performer PHA's 5-Year Action Plan through 12/31/20.</p>	24 CFR § 905.314(c)	24
<p>PHAs are required to complete an energy audit for each PHA-owned project not less than once every five years. HUD is waiving this requirement and is alternatively suspending the performance of the audits for one year for those that were due before December 31, 2020.</p>	24 CFR § 965.302	25

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PUBLIC HOUSING WAIVERS

Waiver Summary	Reference	Page Number
PHAs may delay resident council elections beyond the three-year limit if necessary. The delayed resident council election must be rescheduled and held as soon as reasonably possible once circumstances permit, after 7/31/20	24 CFR § 964.130(a)(1)	26
PHAs are required by regulation to provide 30-day notice to impacted families for changes to policies, rules and special charges to families. <ul style="list-style-type: none"> Through 7/31/20, HUD is waiving the requirement to provide such advance notice, except advance notice must be provided for any changes related to tenant charges PHAs must still provide adequate notification to impacted families within 30 days of making such changes. 	24 CFR § 966.5	27

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DESIGNATED HOUSING PLAN

Waiver Summary	References	Page Number
For PHAs that have submitted a Designated Housing Plan, under existing statute if HUD does not respond within 60 days the plan is considered accepted. <ul style="list-style-type: none"> HUD is temporarily waiving this deadline to ensure that it can review and adequately address any fair housing concerns but will complete Designated Housing Plan reviews as expeditiously as possible. HUD is waiving the 60-day notification requirement for those plans submitted after March 1, 2020 through July 31, 2020 	Section 7(e)(1) of 1937 USHA	30

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REMOTE VIDEO INSPECTIONS (RVI)

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WHAT IS RVI?

Remote Video Inspection (RVI) is a regular HQS inspection performed remotely with a “proxy” inspector with the PHA HQS inspector remotely directing the inspection.

The RVI would not change the current HQS requirements, Lead Based Paint (LBP) requirements or any additional criteria adopted by the PHA.

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BENEFITS OF RVI

RVI would give PHAs the flexibility to use an alternate inspection method to fulfill the HQS inspection requirements, without compromising the health and safety of the individuals.

A higher level of customer service for both the landlord and tenant due to the quick turnaround for complaint inspections, initial inspections, and re-inspections.

A more efficient process without the associated costs incurred from driving to one inspection to another.

RVI could amount to an increased number of completed inspections each day due to the reduced commute time between inspections.

RVI could be expanded and used not only for the HCVP but also for Public Housing and possibly adopted for REAC UPCS inspections in certain situations.

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HOW DOES A PHA UTILIZE RVI?

HUD PIH Notice 2020-05 has waived the Administrative Plan and Annual Plan requirements so this is all that is required to get RVI up and running.

REAC requests PHAs notify REAC they are instituting the RVI for tracking purposes - ISDV_RVIusers@hud.gov

The Department will post the RVI best practice document and send a link in a subsequent Q&A

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ITEMS NEEDED BY PROXY INSPECTOR

Distance measuring device, i.e., a tape measure

Lighting device, i.e., a flashlight)

Circuit analyzer

Telescoping stick or ladder to test smoke and carbon monoxide detectors

If needed, the proxy inspector will bring a temperature device for displaying the temperature of the unit

A fully charged smartphone or tablet that has a reliable internet connection (Wi-Fi or at least 4G wireless service)

Smartphone or tablet must have enough camera resolution (megapixels, sensors and pixel size) for the HQS inspector to see items in detail such as paint chips, broken glass, etc.

PHA needs to approve the proxy inspector so either the owner or owner's representative and, in some cases, the tenant

Any additional items the PHA may wish to include

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SCHEDULING THE RVI HQS INSPECTION

The PHA would use its normal procedure for scheduling the inspection (RFTA initial, special, annual or biennial).

Once scheduled, the HQS inspector will use the designated streaming web-based platform the PHA has chosen to contact the proxy inspector. The HQS Inspector will use the form the PHA currently uses to record any deficiencies. If the PHA currently uses handheld devices, it may need to adopt an interim process. For example, the inspector could record on paper or directly into the computer software as an alternative.

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THE RVI INSPECTION PROCESS

PHAs have the responsibility to develop a procedure for RVI process. It is recommended the below step-by-step Standard Operating Procedure (SOP) would allow for consistency among inspectors and proxy inspectors. All fail items would need to have a photo taken for the file and any re-inspections purposes. The following details the inspection process as it should occur:

RVI would start on the outside of the unit/building structure. It must show the address and recommended street name as well.

Once the unit is confirmed to be the correct unit the inspection would begin with the exterior of the unit (walls, roof any exterior inspectable item including the yard) and adjoining properties.

The exact flow of the inspection inside of the unit including any common areas would be up to the PHA, however, it is strongly recommended that the PHA has a (SOP) detailing how the inspection should be conducted including in which rooms an inspector shall begin and end.

It is important that the PHA still follow all the Lead Based Paint (LBP) requirements for an HQS inspection.

After the inspection is completed it would be uploaded into the PHA's system for letters to be generated for either the landlord and/or tenant. It is possible for the proxy inspector to schedule a re-inspection if needed and in accordance with the PHA's policy.

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THE RVI HQS CERTIFICATIONS

PHAs should develop an agreement that allows the PHA to conduct the inspection via RVI executed by the individual who has legal possession of the unit whether that be tenant or landlord

Ensure that the unit is verified before commencement of the inspection - start with the outside of the unit showing the address and street

Landlord and tenant provide e-mail address / phone number to receive any notifications of deficiencies and or reschedule inspections

Certifies that there is not a smell of Natural Gas, Methane or other noxious gas

Certifies that the proxy inspector fully disclosed all deficiencies to the HQS inspector (this may need a separate legal written sign off to ensure if proxy purposely omits deficient items, that there can be a recourse)

Certifies that the proxy inspector will not record the RVI stream (this may also need legal review due to possible PII concerns)

Certifies that the proxy inspector will follow the directions of the inspector to the best of their abilities

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PUBLIC HOUSING ELIGIBLE USES

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SPECIAL CORONAVIRUS ELIGIBLE USES: PREPARING FOR

Creation or update of infectious disease outbreak plan;

Sourcing and purchasing personal protective equipment for PHA staff;

Coordination with providers of services needed to support residents as a result of coronavirus, including cost of delivery of goods, supplies, and equipment;

Coordination with local health service providers for activities, including: the development or provision of guidance to staff or residents, travel for testing, or other reasons related to coronavirus;

Childcare costs for residents so that they can continue to work, and childcare costs for staff performing essential functions (as defined at the state/local), to the extent they would not have incurred otherwise; and

Other reasonable expenses related to preparing for the coronavirus.

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SPECIAL CORONAVIRUS ELIGIBLE USES: PREVENTING

- Costs related to maintaining adequate social distancing, including modifying or limiting access to communal spaces, increasing service hours to prevent crowding in waiting areas, or any other costs incurred to ensure adequate distance among staff and residents;
- Costs of delivering supplies so that staff or residents can shelter in place, thereby reducing exposure to the greatest number of people;
- Direct costs related to limiting the spread of the coronavirus, including travel costs for testing, or other preventive health measures related to coronavirus;
- Expenses of isolating people suspected of being exposed or those at high-risk of serious complications if infected (e.g., elderly residents, and residents with underlying conditions);
- Costs of protecting residents (particularly high-risk residents) from exposure from interaction with PHA staff and vice versa;
- Payment of salaries of PHA staff unable to work because of the coronavirus public health restrictions (e.g., office management staff who cannot go into the office and cannot perform work remotely, or payment of full salaries of PHA staff forced to work part-time because of lack of child care); and
- Other reasonable expenses related to preventing the coronavirus.

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SPECIAL CORONAVIRUS ELIGIBLE USES: RESPONDING TO

- Expenses of caring for PHA staff and residents who have tested positive, but do not require immediate hospitalization, including:
 - Payment for increases in sick leave allowances for PHA staff;
 - Physical, personnel, or security costs incurred to limit movement;
 - Costs to safely transport residents that tested positive to a quarantine facility; and
 - Costs of supporting residents in quarantine such as health-related supplies (e.g., masks and cleaning supplies).
- Expenses to safely transport residents/staff in need of medical attention;
- Expenses incurred because of coronavirus restrictions impacting PHA operations (e.g., paying for transportation expenses for PHA staff who rely on public transit that is no longer available);
- Costs to facilitate and coordinate with local schools and local governments receiving funds from the Department of Education for the education of students in public housing households:
 - Internet connection infrastructure and
 - Tablets or other low-cost computers for students.
- Other reasonable expenses incurred while responding to the coronavirus.

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USING CAPITAL FUNDS FOR CORONAVIRUS

PHAs may use
Capital Funds for
Coronavirus
purposes:

New EPIC
Budget Line Item
(BLI) 1509

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REPORTING

Still developing reporting process for CARES Act fund

CARES Act has
additional
reporting
requirements

- Reports due 10 days after the end of each calendar quarter
- The report should contain information regarding:
 - the amount of funds received;
 - the amount of funds obligated or expended for each project or activity;
 - a detailed list of all such projects or activities, including a description of the project or activity; and
 - detailed information on any subcontracts or subgrants awarded by the recipient

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HCV ADMIN FEE ELIGIBLE USES

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PURPOSES OF CARES ACT ADMIN FEES

Any currently eligible HCV (including Mainstream voucher) administrative costs during the period that the program is impacted by coronavirus; and

New coronavirus-related activities, including activities to support or maintain the health and safety of assisted individuals and families, and costs related to the retention and support of participating owners.

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SPECIAL CORONAVIRUS ELIGIBLE USES

- Procuring cleaning supplies and/or services to maintain safe and sanitary HCV units, including common areas of PHA-owned Project Based Voucher (PBV) projects.
- Relocation of participating families to health units or other designated units for testing, hospitalization, or quarantine, or transportation to these locations to limit the exposure that could be caused by using mass transportation.
- Additional costs to supportive services vendors incurred due to coronavirus.
- Costs to retain or increase owner participation in the HCV Program, such as incentive costs (e.g. the PHA offers owner an incentive payment to participate in recognition of added difficulties of making units available for HCV families to rent while stay-at-home orders or social distancing practices are in effect).
- Costs for providing childcare for the children of PHA staff that would not have otherwise been incurred (e.g. children at home due to school closings, PHA staff are working outside regular work schedules, etc.).

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SPECIAL CORONAVIRUS ELIGIBLE USES

- Costs associated with the delivery of goods, including food and medical supplies that comply with the Centers for Disease Control (CDC) requirements, to program participants.
- Public health-related security costs to enforce orders to shelter-in-place, stay-at-home orders or visitor-restriction policies for PHA owned PBV projects.
- Administration costs associated with the implementation of coronavirus-related activities that are not eligible HCV administrative costs (e.g., paying overtime to staff to carry-out these coronavirus-related activities).
- Other costs either directly or indirectly related to coronavirus as determined eligible on a case-by-case basis at the Secretary's discretion.

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ADDITIONAL SPECIAL ELIGIBLE USES

- Hiring of temporary employees to maintain program operations due to coronavirus
- Posted at: https://www.hud.gov/program_offices/public_indian_housing/programs/hcv, under *List of Eligible Coronavirus-Related Activities*

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REPORTING

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NAHRO POLICY & ADVOCACY CONTACT INFORMATION

Georgi Banna, Esq.

Director of Policy and Program Development

gbanna@nahro.org

Tess Hembree

Director of Congressional Relations

thembree@nahro.org

www.nahroblog.org

www.nahro.org/coronavirus

www.nahro.org/advocacy

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