

On March 27, 2020, The CARES Act (Public Law 116-136) was signed into law as a response to the SARS-CoV-2 Coronavirus pandemic, and the disease (COVID-19) it causes. Pursuant to this Act, the Department of Housing and Urban Development (HUD) waived and established alternative requirements for numerous statutory and regulatory requirements for the Public Housing and Housing Choice Voucher (HCV) programs. HUD Notice PIH 2020-05, issued April 10, 2020, lists and describes these waivers. HUD Notice PIH 2020-13, issued July 2, 2020 and HUD Notice PIH 2020-33, issued November 30, 2020, supersedes to affirm, update, and expand waivers.

The Philadelphia Housing Authority (PHA) has elected to utilize some of the waivers and alternative requirements, as these flexibilities allowed PHA to focus on its most urgent matters. The waivers PHA will be utilizing are outlined in the below table:

PH and HCV-2	Family income and composition – delayed annual reexaminations	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
PH and HCV-3	Annual reexamination Income Verification	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
PH and HCV-4	Interim reexaminations	Waives the requirement to use the income verification requirements, including the use of EIV, for interim reexaminations
PH and HCV-5	EIV System Monitoring	Waives the mandatory EIV monitoring requirements
PH and HCV-6	FSS Contract of Participation	Provides for extensions to FSS contract of participation
HQS-4	Initial HQS -Alternative Inspections	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 October 31, 2020 unless PHA elects new published date of 6/30/2021.
HQS-5	Biennial Inspections	Allows for delay in biennial inspections; All delayed biennial inspections resume by 6/30/21 and be completed by 12/31/21.
HQS-6	Interim Inspections	Waives the requirement for the PHA to conduct interim inspection and requires alternative method; Allows for repairs to be verified by alternative methods
HQS-9	HQS QC Inspections	Provides for a suspension of the requirement for QC sampling inspections
HQS-11	Homeownership HQS	Waives the requirement to perform an initial HQS inspection in order to begin making homeownership assistance payments; Requires family to obtain independent professional inspection
HCV-7	Increase in Payment Standard	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
PH-1	Fiscal closeout of Capital Grant Funds	Extension of deadlines for ADCC and AMCC
PH-3	Cost and Other Limitations: Types of Labor	Allows for the use of force account labor for modernization activities in certain circumstances
PH-5	CSSR	Temporarily suspends CSSR
PH-7	Over-income families	Changes to timeframes for determination of over-income
PH-8	Resident Council Elections	Provides for delay in resident council elections
PH-9	Utility Allowance	Provides for delay in updating utility allowance schedule
PH-12	Public Housing Agency Annual Self-Inspections	Waives the requirement that the PHA must inspect each project
PH-13	Over-Income Limit: Termination Requirement	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
11c	Financial reporting	Allows for extensions of financial reporting deadlines
12c	Deadline for reporting Operating and Capital Fund expenditures	Provides a one-year extension