

## Example Charts for Tracking Public Housing and HCV CARES Act Waivers and Alternative Requirements

The following charts summarize the waivers authorized under [PIH Notice 2020-05](#) and the availability period for each. These charts are for reference only and no information is being collected. An agency may not collect information, and you are not required to complete any form, unless it displays a currently valid Office of Management and Budget (OMB) control number. HUD is currently seeking approval from OMB, as required by the Paperwork Reduction Act of 1995, 44 U.S.C. § 3501 et. seq, for a form if and when it determines it will collect this information from PHAs.

**Public Housing Authorities (PHAs):** As stated in Section 5 of the notice, 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. Refer back to the Notice using the item code for a full description and more detailed information.

| Item  | Statutory and regulatory waivers  | Summary of alternative requirements  | Availability Period Ends   | Did PHA implement waiver and alternative requirement? | Date of PHA adoption |
|---|---|--|--|---|----------------------|
| PH and HCV-1<br>PHA 5-Year<br>and Annual<br>Plan                        | <u>Statutory Authority</u><br>Section 5A(a)(1),<br>Section 5A(b)(1),<br>Section 5A(g), Section<br>5A(h)<br><br><u>Regulatory Authority</u><br>§ 903.5(a)(3),<br>903.5(b)(3), 903.21 | <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>7/31/20</li> </ul> | Yes   | 4/15/20              |
| PH and HCV-2<br>Family income<br>and<br>composition –<br>delayed annual | <u>Statutory Authority</u><br>Section 3(a)(1)<br><br><u>Regulatory Authority</u><br>§ 982.516(a)(1), §  | <ul style="list-style-type: none"> <li>Permits the PHA to delay the annual reexamination of income and family composition</li> </ul> | <ul style="list-style-type: none"> <li>12/31/20</li> </ul>                             | Yes   | 4/15/20              |

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| reexaminations  | 960.257(a)   | <ul style="list-style-type: none"> <li>HCV PHAs must implement HCV-7 for impacted families if they implement this waiver</li> </ul>   |   |   |                      |
| PH and HCV-3 Annual reexamination Income Verification | <u>Regulatory Authority</u><br>§ 5.233(a)(2)<br><br><u>Sub-regulatory Guidance</u><br>PIH Notice 2018-18   | <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>7/31/20</li> </ul> | Yes   | 4/15/20              |
| PH and HCV-4 Interim reexaminations                   | <u>Statutory Authority</u><br>Section 3(a)(1)<br><br><u>Regulatory Authority</u><br>§ 5.233(a)(2),<br>982.516(c)(2),<br>960.257(b) and (d)<br><br><u>Sub-regulatory Guidance</u> | <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>7/31/20</li> </ul> | Yes   | 4/15/20              |

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|  | PIH Notice 2018-18  |   |   |   |                      |
| PH and HCV-5 EIV System Monitoring         | <u>Regulatory Authority</u> § 5.233<br><u>Sub-regulatory Guidance</u><br>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>• 7/31/20</li> </ul>                     | Yes   | 4/15/20              |
| PH and HCV-6 FSS Contract of Participation | <u>Regulatory Authority</u> § 984.303(d)  | <ul style="list-style-type: none"> <li>• Provides for extensions to FSS contract of participation</li> </ul>  | <ul style="list-style-type: none"> <li>• 12/31/20</li> </ul>                    |   |                      |
| PH and HCV-7 Waiting List                  | <u>Regulatory Authority</u> § 982.206(a)(2)<br>PIH Notice 2012-34   | <ul style="list-style-type: none"> <li>• Waives public notice requirements for opening and closing waiting list</li> <li>• Requires alternative process</li> </ul>  | <ul style="list-style-type: none"> <li>• 7/31/20</li> </ul>                     | no  |                      |
| HQS-1 Initial inspection                   | <u>Statutory Authority</u> Section 8(o)(8)(A)(i), Section 8(o)(8)(C)<br><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 October 31, 2020.</li> </ul> | <ul style="list-style-type: none"> <li>• 7/31/20</li> <li>• 10/31/20</li> </ul> | no  |                      |
| HQS-2: <u>PBV Pre-HAP Contract</u>         | <u>Statutory Authority:</u> Section 8(o)(8)(A)  | <ul style="list-style-type: none"> <li>• Changes inspection requirements, allowing for owner certification</li> </ul>   | <ul style="list-style-type: none"> <li>• 7/31/20</li> </ul>                     | no  |                      |

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| <u>Inspections, PHA acceptance of completed units</u>           | <u>Regulatory Authority:</u><br>§§ 983.301(b),<br>983.156(a)(1)  | that there are no life-threatening deficiencies<br><ul style="list-style-type: none"> <li>Where self-certification was used, PHA must inspect the unit no later than October 31, 2020.</li> </ul>  | <ul style="list-style-type: none"> <li>10/31/20</li> </ul>                  |   |                      |
| HQS-3<br>Non-Life Threatening<br>HQS - Initial<br>Unit Approval | <u>Statutory Authority</u><br>Section 8(o)(8)(A)(ii)<br><br><u>Regulatory Authority</u><br>HOTMA HCV Federal<br>Register Notice January<br>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>7/31/20</li> </ul>                   | Yes   | 4/15/20              |
| HQS-4<br>Initial HQS -<br>Alternative<br>Inspections            | <u>Statutory Authority</u><br>Section 8(o)(8)(A)(iii)<br><br><u>Regulatory Authority</u><br>HOTMA HCV Federal<br>Register Notice January<br>18, 2017 | <ul style="list-style-type: none"> <li>Under Initial HQS Alternative Inspection Option - allows for commencement of assistance payments based on owner certification there are no life-threatening deficiencies</li> <li>Where self-certification was used, PHA must inspect the unit no later than October 31, 2020.</li> </ul> | <ul style="list-style-type: none"> <li>7/31/20</li> <li>10/31/20</li> </ul> | No  |                      |

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| HQS-5<br>Biennial Inspections                       | <u>Statutory Authority</u><br>Section 8(o)(D)<br><br><u>Regulatory Authority</u><br>§§ 982.405(a),<br>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 than October 31, 2020.</li> </ul> | <ul style="list-style-type: none"> <li>10/31/20</li> </ul>                  | No  |                      |
| HQS-6<br>Interim Inspections                        | <u>Statutory Authority</u><br>Section 8(o)(8)(F)<br><br><u>Regulatory Authority</u><br>§§ 982.405(g), §<br>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>7/31/20</li> </ul>                   | No  |                      |
| HQS-7<br>PBV Turnover Inspections                   | <u>Regulatory Authority</u><br>§ 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</li> </ul>         | <ul style="list-style-type: none"> <li>7/31/20</li> <li>10/31/20</li> </ul> | No  |                      |
| HQS-8: <u>PBV HAP Contract – HQS Inspections to</u> | <u>Statutory Authority</u><br>Section 8(o)(8)(A)<br><br><u>Regulatory Authority</u><br>§§ 983.207(a),                 | <ul style="list-style-type: none"> <li>Allows for PBV units to be added or substituted in the HAP contract based on owner</li> </ul>   | <ul style="list-style-type: none"> <li>7/31/20</li> </ul>                   | No  |                      |

| Item                              | Statutory and regulatory waivers  | Summary of alternative requirements  | Availability Period Ends  | Did PHA implement waiver and alternative requirement? | Date of PHA adoption |
|-----------------------------------|---|--|---|---|----------------------|
| <u>Add or Substitute Units</u>    | 983.207(b)  | certification there are no life-threatening deficiencies <ul style="list-style-type: none"> <li>• Allows for delayed full HQS inspection</li> </ul>  | <ul style="list-style-type: none"> <li>• 10/31/20</li> </ul>                      |   |                      |
| HQS-9<br>HQS QC Inspections       | <u>Regulatory Authority</u><br>§ 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>• 10/31/20</li> </ul>                      | Yes   | 04/15/20             |
| HQS--10<br>HQS Space and Security | <u>Regulatory Authority</u><br>§ 982.401(d)   | <ul style="list-style-type: none"> <li>• Waives the requirement that each dwelling unit have at least 1 bedroom or living/sleeping room for each 2 persons.</li> </ul>   | Remains in effect one year from lease term or date of notice, whichever is longer | Yes   |                      |
| HQS-11<br>Homeownership<br>HQS    | <u>Statutory Authority</u><br>Section 8(o)(8)(A)(i),<br>Section 8(y)(3)(B)<br><br><u>Regulatory Authority</u><br>§ 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> <li>•</li> </ul> | <ul style="list-style-type: none"> <li>• 7/31/20</li> </ul>                       |   |                      |
| HCV-1<br>Administrative<br>Plan   | <u>Regulatory Authority</u><br>§ 982.54 (a)   | <ul style="list-style-type: none"> <li>• Waives the requirement to adopt revisions to the admin plan</li> </ul>  | <ul style="list-style-type: none"> <li>• 7/31/20</li> </ul>                       | Yes   | 4/15/20              |
| HCV-2                             | <u>Regulatory Authority</u>   | <ul style="list-style-type: none"> <li>• Waives the requirement</li> </ul>   | <ul style="list-style-type: none"> <li>• 7/31/20</li> </ul>                       |   |                      |

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| PHA Oral Briefing                                | § 982.301(a)(3)<br>§ 983.252(a)                | for an oral briefing <ul style="list-style-type: none"> <li>Provides for alternative methods to conduct required voucher briefing</li> </ul>   |  |   |                      |
| HCV-3<br>Term of Voucher -<br>Extensions of Term | <u>Regulatory Authority</u><br>§ 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>7/31/20</li> </ul>  | Yes   | 4/15/20              |
| HCV-4<br>PHA Approval of Assisted Tenancy        | <u>Regulatory Authority</u><br>§ 982.305(c)    | <ul style="list-style-type: none"> <li>Provides for HAP payments for contracts not executed within 60 days</li> <li>PHA must not pay HAP to owner until HAP contract is executed</li> </ul>                                      | <ul style="list-style-type: none"> <li>7/31/20</li> </ul>  | Yes   | 4/15/20              |
| HCV-5<br>Absence from unit                       | <u>Regulatory Authority</u><br>§ 982.312       | <ul style="list-style-type: none"> <li>Allows for PHA discretion on absences from units longer than 180 days</li> <li>PHAs must not make HAP payments beyond 12/31/20 for units vacant more than 180 consecutive days</li> </ul> | <ul style="list-style-type: none"> <li>12/31/20</li> </ul> | Yes   | 4/15/20              |
| HCV-6<br>Automatic                               | <u>Regulatory Authority</u><br>§ 982.455       | <ul style="list-style-type: none"> <li>Allows PHA to extend the period of time after</li> </ul>  | <ul style="list-style-type: none"> <li>12/31/20</li> </ul> | Yes   | 4/15/20              |

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|------------------------------------|--|--|--|---|----------------------|
| Termination of the HAP Contract    |  | the last HAP payment is made before the HAP contract terminates automatically.   |  |   |                      |
| HCV-7 Increase in Payment Standard | <u>Regulatory Authority</u> § 982.505(c)(4)  | <ul style="list-style-type: none"> <li>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.</li> </ul> | <ul style="list-style-type: none"> <li>12/31/20</li> </ul> | No  |                      |
| HCV-8 Utility Allowance Schedule   | <u>Regulatory Authority</u> § 982.517  | <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> | Yes   | 4/15/20              |
| HCV-9 Homeownership Counseling     | <u>Statutory Authority</u> Section 8(y)(1)(D)<br><u>Regulatory Authority</u> § 982.630, 982.636(d) | <ul style="list-style-type: none"> <li>Waives the requirement for the family to obtain pre-assistance counseling</li> </ul>  | <ul style="list-style-type: none"> <li>7/31/20</li> </ul>  | No  |                      |
| 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> | No  |                      |
| PH-1 Fiscal closeout               | <u>Regulatory Authority</u> § 905.322(b)   | <ul style="list-style-type: none"> <li>Extension of deadlines for ADCC and AMCC</li> </ul>   | Varies by PHA  | No  |                      |



| Item                            | Statutory and regulatory waivers  | Summary of alternative requirements   | Availability Period Ends  | Did PHA implement waiver and alternative requirement? | Date of PHA adoption |
|---------------------------------|---|---|---|---|----------------------|
| of Capital Grant Funds          |   |   |   |   |                      |
| PH-2<br>Total Development Costs | <u>Regulatory Authority § 905.314(c)</u>  | <ul style="list-style-type: none"> <li>• 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</li> </ul> | Applies to development proposals submitted to HUD no later than December 31, 2021 | No  |                      |
| PH-3<br>Cost limitations        | <u>Regulatory Authority § 905.314(j)</u>  | <ul style="list-style-type: none"> <li>• Allows for the use of force account labor for modernization activities in certain circumstances</li> <li>•</li> </ul>                    | <ul style="list-style-type: none"> <li>• 12/31/20</li> </ul>                      | No  |                      |
| PH-4<br>ACOP                    | <u>Regulatory Authority § 960.202(c)(1)</u>   | <ul style="list-style-type: none"> <li>• Changes to approval process for ACOP</li> </ul>  | <ul style="list-style-type: none"> <li>• 7/31/20</li> </ul>                       | No  |                      |
| PH-5<br>CSSR                    | <u>Statutory Authority Section 12(c)</u><br><br><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>                       | No  |                      |
| PH-6<br>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   | No  |                      |

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| PH-7<br>Over-income families       | Housing Opportunity Through Modernization Act of 2016: Final Implementation of the Public Housing Income Limit 83 FR 35490<br>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>                           | No  |                      |
| PH-8<br>Resident Council Elections | <u>Regulatory Authority</u><br>§ 964.130(a)(1)   | <ul style="list-style-type: none"> <li>Provides for delay in resident council elections</li> </ul>  | <ul style="list-style-type: none"> <li>7/31/20</li> </ul>                            | No  |                      |
| PH-9<br>Utility Allowance          | <u>Regulatory Authority</u><br>§ 965.507   | <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>                           | No  |                      |
| PH-10<br>Tenant notifications      | <u>Regulatory Authority</u><br>§ 966.5   | <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>7/31/20</li> </ul>                            | No  |                      |
| 11a<br>PHAS                        | <u>Regulatory Authority</u><br>24 CFR Part 902   | <ul style="list-style-type: none"> <li>Allows for alternatives related to inspections</li> <li>PHA to retain prior year PHAS score unless requests otherwise</li> </ul> | HUD will resume issuing new PHAS scores starting with PHAs with FYE dates of 3/31/21 | N/A   | N/A                  |
| 11b<br>SEMAP                       | <u>Regulatory Authority</u><br>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  | N/A   | N/A                  |

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|---|---|---|---|---|----------------------|
|   |   |   | scores starting with PHAs with FYE dates of 3/31/21   |   |                      |
| 11c<br>Financial reporting  | <u>Regulatory Authority</u><br>§§ 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   | Yes   | 4/15/20              |
| 12a<br>Form HUD 50058   | <u>Regulatory Authority</u><br>24 CFR Part 908, § 982.158<br><br><u>Sub-regulatory Guidance</u><br>PIH Notice 2011-65 | <ul style="list-style-type: none"> <li>Waives the requirement to submit 50058 within 60 days</li> <li>Alternative requirement to submit within 90 days of the effective date of action</li> </ul> | <ul style="list-style-type: none"> <li>12/31/20</li> </ul>  | Yes   | 4/15/20              |
| 12b<br>Designated housing plan  | <u>Statutory Authority</u><br>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>   | N/A   | N/A                  |
| 12c<br>Deadline for reporting Operating and Capital Fund expenditures | <u>Statutory Authority</u><br>Section 9(j)<br><u>Regulatory Authority</u><br>§ 905.306(d)(5)                          | <ul style="list-style-type: none"> <li>Provides a one-year extension</li> </ul>   | One-year extension, however no programmatic expenditure end date shall be extended beyond one month prior to closure of relevant appropriations acc | Yes   | 4/15/20              |