

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, supersedes 2020-05 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:

| Elected Waiver | | Summary of alternative requirements |
|----------------|--|---|
| 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 12/31/2020. |
| HQS-5 | Biennial Inspections | Allows for delay in biennial inspections; All delayed biennial inspections must be completed as soon as reasonably possible but by no later than 1 year after the date on which the biennial inspection would have been required absent the waiver. |
| 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 |
| 11c | Financial reporting | Allows for extensions of financial reporting deadlines |
| 12c | Deadline for reporting Operating and Capital Fund expenditures | Provides a one-year extension |