

## **EXTENDED COVID - 19 POLICY**

**(Referenced Notice: PIH 2020-33 issued November 30, 2020 supersedes PIH 2020-13 COVID-19 Statutory and Regulatory Waiver Notice)**

### **BINGHAMTON HOUSING AUTHORITY (NY016) SECTION 8 COVID-19 WAIVER POLICIES**

**November 30, 2020-Effective Immediately**

- **PH and HCV-2 FAMILY INCOME AND COMPOSITION: DELAYED ANNUAL EXAMINATIONS-page 8 from PIH 2020-05**

**The BHA will continue to process all annual recertifications.**

- **PH AND HCV-3: FAMILY INCOME AND COMPOSITION: ANNUAL EXAMINATION-INCOME VERIFICATION REQUIREMENT-PAGE 10**

**The BHA will use EIV and tenant provided 3rd party documents if possible HOWEVER will utilize waiver option to use self-certification should family be unable to provide documentation. The self-certification may occur over the telephone (with a contemporaneous written note by the BHA staff), by an email statement from the family, postal mail from the family or other electronic communications.**

**The period of availability to use this waiver/alternative requirement ends June 30, 2021.**

- **PH and HCV-4: FAMILY INCOME AND COMPOSITION: INTERIM EXAMINATIONS-PAGE 11-12**

**The BHA will process all interim re-exam requests prioritizing loss of income requests. We will utilize the waiver to accept a self-certification when family is unable to provide tenant provided 3<sup>rd</sup> party documents. The self-certification may occur over the telephone (with a contemporaneous written note by the BHA staff), through an email statement from the family or other electronic communications.**

**The period of availability to conduct interim reexaminations using these modified verifications requirements ends June 30, 2021.**

- **HQS-1: INITIAL INSPECTION REQUIREMENTS-PAGE 14-15**

**Vacant Unit:** The BHA will conduct a full initial inspection when the unit is vacant and has been cleaned, there cannot be any belongings or garbage from the previous tenant in the unit and the utilities need to be turned on.

**In-Place Lease Scenario:** The notice advises in order to place the unit under HAP contract AND commence making payments, the PHA may rely on an owners self-certification that the owner “has no reasonable basis to have knowledge that life threatening conditions exist in the unit or units in question instead of conducting an initial inspection”. At a minimum the PHA MUST require this owner certification.

The BHA will accept an owner’s self-certification that states the language above and in addition the BHA will also require the owner to certify that ALL smoke detectors and carbon monoxide detectors are present and working. The HQS inspector will review with the owner where the detectors should be placed. The BHA caseworker will review and verify with the perspective tenant that it is agreeable. If is not acceptable, no physical inspection will be completed, we will not be able to enter into a HAP Contract and perspective tenant will have to wait to lease with section 8 subsidy until we can physically inspect the unit.

The period of availability for PHA’s to accept an owner’s self-certification for an initial inspection ends on June 30, 2021. For any unit for which a PHA accepted an owner’s self-certification, the PHA must conduct an HQS inspection as soon as possible BUT no later than the 1-year anniversary of the date of the owner’s certification.

- **HQS-5: HQS INSPECTION REQUIREMENT-BIENNIAL INSPECTIONS-PAGE 17**

The BHA will delay interior biennial inspections HOWEVER will perform an exterior biennial inspection to ward off any potential weather related conditions that occur in our area later in the year. We will require the owner to correct the violations within the normal 30 day deadline. Because our cold climate conditions begin to occur later in the year (October and after), should we postpone the exterior inspection until later in the year, it may make it impossible for the owner to correct an HQS violation should it be related to exterior painting, safely getting on a ladder or securing a contractor should that be the case.

Period of availability: The PHA must conduct the delayed biennial inspection as soon as reasonably possible but NO LATER than 1year after the biennial inspection would have been required absent the waiver.

- **HQS-6: HQS Interim Inspections (special inspections)-page 18**

**If the reported deficiency is life threatening, the BHA must notify the owner of the reported life threatening deficiency and that the owner must either correct the life threatening deficiency within 24 hours of the BHA notification OR provide documentation (e.g., text or email a photo to the BHA) that the reported deficiency does not exist.**

**In the case of a reported non-life threatening deficiency, the BHA must notify the owner of the reported deficiency within 30 days and the owner must either make the repair or document (e.g., text or email a photo to the BHA) that the deficiency does not exist within 30 days of the BHA notification or any approved extension.**

**As is the case under the current HCV program requirements, the BHA is not required to conduct an on-site inspection to verify the repairs have been made but may rely on alternative verification methods (e.g., photos submitted by the owner, tenant certification, etc).**

**The BHA will accept photos submitted by the owner verifying the deficiency has been corrected AND verify with the tenant that the deficiency has been corrected.**

**The period to utilize the waiver ends June 30, 2021. After June 30, 2021, the BHA must conduct the HQS inspection in accordance with the applicable time periods upon notification by a family or government official that the assisted unit does not comply with the HQS.**

- **HQS-9: HQS Quality Control Inspections (SEMAP)-page 19**

**The period of availability ends June 30, 2021. See PIH notice for details.**

- **HQS-10: Housing quality standards; space and security-page 20**

**The BHA will allow a current participant that needs to add a member or members to the assisted household as a result of the COVID-19 emergency even though the additional family members would result in the unit not meeting the space and security standards. THIS PROVISION DOES NOT APPLY TO AN INITIAL OR NEW LEASE. A participant must not enter into a new lease that does not comply with the space and security standards.**

**The waiver will be in effect for the duration of the current lease term or one year from the date of this notice, whichever period of time is longer.**

- **HCV-2: Information When Family is Selected-PHA Oral Briefing-page 21**

**The BHA will conduct briefings to applicants or participants by webcast, video call, telephone, or expanded information packet. We will ensure that the method of communication for the briefings will allow for equal participation of each family member and persons with a disability or limited English proficiency.**

**The period of availability to use this waiver ends June 30, 2021.**

- **HCV-3: Term of Voucher-Extensions of Term-page 21**

**The BHA will provide voucher extensions through the period of availability.**

**The period of availability to use this waiver ends June 30, 2021.**

- **HCV-4: PHA Approval of Assisted Tenancy-When HAP Contract is executed-page 21-22**

**The BHA will utilize the waiver allowing the BHA to execute the HAP contract after the 60-day deadline has passed and make housing assistance payments back to the beginning of the lease term. HOWEVER the BHA and owner MUST execute the HAP contract no later than 120-days from the beginning of the lease term.**

**The period of availability to execute the HAP contract after the normal 60-day period from the beginning of the lease term ends on June 30, 2021.**

- **HCV-5: Absence from Unit-page 22.**

**The BHA will utilize the waiver and continue housing assistance payments and not terminate the HAP contract due to extenuating circumstances (e.g., hospitalization, extended stays at nursing homes, caring for family members, or any other reason the housing authority deems is extenuating, including circumstances out of the families control due to the COVID-19 emergency).**

**The period of availability for the BHA to choose to continue making HAP payments despite the family's absence of more than 180 consecutive days ends on June 30, 2021. The BHA may not make payments beyond June 30, 2021, and the HAP contract will terminate on that date if the family is still absent from the unit.**

- **HCV-6: Automatic Termination of HAP contract-Zero HAP-page 22**

The BHA will utilize the waiver and allow the family to remain on the program beyond the 180-day period of time that follows the last payment to the owner. The BHA will provide written notice to the owner and family of this extension as well as the extension deadline. The BHA will use the full period of availability as the extension deadline.

The period of availability for the extension ends June 30, 2021. The PHA may not extend the HAP contract beyond June 30, 2021.

- **HCV-8: Utility Allowance schedule-required review and revision-page 23**

The BHA will only utilize this waiver if the company we contract with is unable to provide us with updated utility allowances by our normal renewal date OR we are unable to provide the company with the required data necessary for them to complete our schedules.

The period of availability to review and update the utility allowances that are due at some point in CY 2020 must be completed no later than June 30, 2021.

- **PHA'S, SEMAP, and Uniform Financial Reporting Standards-page 31**

b. SEMAP- For PHAs with a fiscal year ending on or before June 30, 2021, HUD will not issue a new SEMAP score unless the PHA requests that a new SEMAP score be issued. HUD will instead carry forward the most recent SEMAP score on record.

The BHA will make that determination in the near future.

The period of availability: HUD will resume issuing new SEMAP scores beginning with PHAs with fiscal year end dates of June 30, 2021.

- **NOTE: The BHA may utilize other waivers and administrative relief that is published throughout the waiver regulation that is not currently included in our waiver policy should the occasion arise. We will add any additional waivers we adopt to our waiver policy.**

