

Summary of Public Housing Waivers and Alternative Requirements

This chart summarizes the waivers authorized under this Notice and the availability period for each. As stated in Section 5, 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.

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 PHA 5-Year and Annual Plan Submission Dates: Significant Amendment Requirements	<u>Statutory Authority</u> Section 5A(a)(1), Section 5A(b)(1), Section 5A(g), Section 5A(h)(2) <u>Regulatory Authority</u> §§ 903.5(a)(3), 903.5(b)(3), 903.13(c), 903.21, 903.23	<ul style="list-style-type: none"> Alternative dates for submission Changes to significant amendment process 	<ul style="list-style-type: none"> Varies based on FYE 12/31/20 	No GHA has a FYE of 3/31 and was not impacted by this waiver. The 2020 Five Year Plan was previously submitted.	N/A
PH and HCV-2 Family Income and Composition: Delayed Annual Examinations	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> §§ 982.516(a)(1), 960.257(a)	<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> 12/31/20 	No GHA completed the annual reexaminations for all residents in July 2020.	N/A

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PH and HCV-3 Family Income and Composition: Annual Examination; Income Verification Requirements	<u>Regulatory Authority</u> §§ 5.233(a)(2), 960.259(c), 982.516(a) <u>Sub-regulatory Guidance</u> PIH Notice 2018-18	<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • 12/31/20 	No The GHA office although closed to the public has been able to continue to work and access the necessary systems in order to verify and complete the annual examination	N/A
PH and HCV-4 Family Income and Composition: Interim Examinations	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> §§ 5.233(a)(2), 982.516(c)(2), 960.257(a), (b) and (d), 960.259(c) <u>Sub-regulatory Guidance</u> PIH Notice 2018-18	<ul style="list-style-type: none"> • Waives the requirement to use the income verification requirements, including the use of EIV, for interim reexaminations 	<ul style="list-style-type: none"> • 12/31/20 	No The GHA office although closed to the public has been able to continue to work and access the necessary systems in order to verify and complete interim examinations	N/A

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PH and HCV-5 Enterprise Income Verification (EIV) Monitoring	<u>Regulatory Authority § 5.233</u> <u>Sub-regulatory Guidance</u> PIH Notice 2018-18	<ul style="list-style-type: none"> • Waives the mandatory EIV monitoring requirements. 	<ul style="list-style-type: none"> • 12/31/20 	No The GHA office has been able to continue to work and access the necessary systems	N/A
PH and HCV-6 Family Self-Sufficiency (FSS) Contract of Participation: Contract Extension	<u>Regulatory Authority § 984.303(d)</u>	<ul style="list-style-type: none"> • Provides for extensions to FSS contract of participation 	<ul style="list-style-type: none"> • 12/31/20 	No GHA does not participate in a FSS program	N/A
PH and HCV-7 Waiting List: Opening and Closing; Public Notice	<u>Regulatory Authority § 982.206(a)(2)</u> <u>Sub-regulatory Guidance</u> PIH Notice 2012-34	<ul style="list-style-type: none"> • Waives public notice requirements for opening and closing waiting list • Requires alternative process 	<ul style="list-style-type: none"> • 12/31/20 	Yes A sign will be placed in the lobby window, notice posted on website, Facebook Page and voicemail message on its main telephone number	07/28/20

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PH-1 Fiscal Closeout of Capital Grant Funds	<u>Regulatory Authority § 905.322(b)</u>	<ul style="list-style-type: none"> Extension of deadlines for ADCC and AMCC 	Varies by PHA AMCC must be submitted no later than 12 months from activity's expenditure deadline.	No AMCC for CFP 15 due no later than 4/12/20 submitted on 5/31/19	N/A
PH-2 Total Development Costs	<u>Regulatory Authority § 905.314(c) - (d)</u>	<ul style="list-style-type: none"> 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 	Applies to development proposals submitted to HUD no later than December 31, 2021	No	N/A
PH-3 Cost and Other Limitations: Types of Labor	<u>Regulatory Authority § 905.314(j)</u>	<ul style="list-style-type: none"> Allows for the use of force account labor for modernization activities in certain circumstances 	<ul style="list-style-type: none"> 12/31/20 	No Applies to Non High Performing Agencies	N/A
PH-4 ACOP: Adoption of Tenant Selection Policies	<u>Regulatory Authority § 960.202(c)(1)</u>	<ul style="list-style-type: none"> Establishes an alternative requirement that policies may be adopted without board approval Any provisions adopted informally must be adopted formally NLT December 31, 2020 	<ul style="list-style-type: none"> 9/30/20 12/31/20 	Yes	TBD

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PH-5 Community Service and Self-Sufficiency Requirement (CSSR)	<u>Statutory Authority</u> Section 12(c) <u>Regulatory Authority</u> §§ 960.603(a) and 960.603(b)	<ul style="list-style-type: none"> Temporarily suspends CSSR 	<ul style="list-style-type: none"> 3/31/21 	Yes	07/28/20
PH-6 Energy Audits	<u>Regulatory Authority</u> § 965.302	<ul style="list-style-type: none"> Allows for delay in due dates of energy audits 	One year beyond 2020 audit deadline	Yes GHA's 5 year energy audit was due before December 31, 2020.	07/28/20
PH-7 Over-Income Families	<u>Statutory Authority</u> Section 16(a)(5) <u>Sub-regulatory Guidance</u> Housing Opportunity Through Modernization Act of 2016: Final Implementation of the Public Housing Income Limit 83 FR 35490, Notice PIH 2019-11	<ul style="list-style-type: none"> Changes to timeframes for determination of over-income 	<ul style="list-style-type: none"> 12/31/20 	No GHA has been able to complete the annual reexams therefore able to assess any over income families	N/A

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PH-8 Resident Council Elections	<u>Regulatory Authority</u> § 964.130(a)(1)	<ul style="list-style-type: none"> Provides for delay in resident council elections 	<ul style="list-style-type: none"> 12/31/20 	Yes	07/28/20
PH-9 Review and Revision of Utility Allowance	<u>Regulatory Authority</u> § 965.507	<ul style="list-style-type: none"> Provides for delay in updating utility allowance schedule 	<ul style="list-style-type: none"> 12/31/20 	No GHA commissioned the utility allowance prior to COVID-19	N/A
PH-10 Tenant Notifications for Changes to Project Rules and Regulations	<u>Regulatory Authority</u> § 966.5	<ul style="list-style-type: none"> Advance notice not required except for policies related to tenant charges 	<ul style="list-style-type: none"> 12/31/20 	No GHA has given advance notices via hand delivery	N/A
PH-11: Designated Housing Plan Renewals	<u>Statutory Authority:</u> Section 7(f)	<ul style="list-style-type: none"> Extends the Plan's effective period through December 31, 2020, for Plans due to expire between the date of this Notice and December 31, 2020. 	<ul style="list-style-type: none"> 12/31/20 	No	N/A

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PH-12: Public Housing Agency Annual Self-Inspections	<u>Statutory Authority:</u> Section 6(f)(3) <u>Regulatory Authority:</u> § 902.20(d)	<ul style="list-style-type: none"> • Waives the requirement that the PHA must inspect each project 	<ul style="list-style-type: none"> • 12/31/20 	Yes Partially GHA completed inspection of 80 of 100 units prior to COVID-19	07/28/20
11a PHAS	<u>Regulatory Authority</u> 24 CFR Part 902	<ul style="list-style-type: none"> • Allows for alternatives related to inspections • PHA to retain prior year PHAS score unless requests otherwise 	HUD will resume issuing new PHAS scores starting with PHAs with FYE dates of 3/31/21	N/A	N/A
11c Uniform Financial Reporting Standards: Filing of Financial Reports; Reporting Compliance Dates	<u>Regulatory Authority</u> §§ 5.801(c), 5.801(d)(1)	<ul style="list-style-type: none"> • Allows for extensions of financial reporting deadlines 	Varies by PHA FYE	Yes GHA FYE 3/31/20 Audited Financial submission due 12/31/20 extended deadline 6/30/21 Unaudited Financial submission extension not needed.	07/28/20

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12a PHA Reporting Requirements on HUD Form 50058	<u>Regulatory Authority</u> 24 CFR Part 908, § 982.158 <u>Sub-regulatory Guidance</u> PIH Notice 2011-65	<ul style="list-style-type: none"> • Waives the requirement to submit 50058 within 60 days • Alternative requirement to submit within 90 days of the effective date of action 	<ul style="list-style-type: none"> • 12/31/20 	N/A	N/A
12b Designated Housing Plans: HUD 60-Day Notification	<u>Statutory Authority</u> Section 7(e)(1)	<ul style="list-style-type: none"> • Allows for HUD to delay notification about designated housing plan 	<ul style="list-style-type: none"> • 7/31/20 	N/A	N/A
12c Extension of Deadline for Programmatic Obligation and Expenditure of Capital Funds	<u>Statutory Authority</u> Section 9(j) <u>Regulatory Authority</u> § 905.306(d)(5)	<ul style="list-style-type: none"> • Provides a one-year extension 	For all open Capital Fund grants, one-year extension from the obligation and expenditure end dates in LOCCS as of April 10, 2020	Yes	07/28/20