

Summary of Public Housing and HCV Waivers and Alternative Requirements

This chart summarizes the waivers authorized under PIH Notice 2020-33 (supersedes notices PIH 2020-05; PIH 2020-13) and the availability period for each waiver. Per PIH Notice 2020-05, all PHAs must keep written documentation on the waivers applied by the PHA as well as the effective dates.

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 – SEMMCHRA will continue our continue practices	
PH and HCV-2 Family Income and Composition – Delayed Annual Reexaminations	<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"> 06/30/2021 All reexams due in CY20 must be completed by 12/31/20. Reexams due between 1/1/21 and 6/30/21 would need to be completed by 6/30/21.	Public Housing and Section 8: No - SEMMCHRA intends to continue usual practices and not implement any delays in re-examinations.	

PH and HCV-3 Family Income and Composition: Annual Reexamination; 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"> • 06/30/2021 	Public Housing and Section 8: Yes – SEMMCHRA will implement this waiver.	03/17/2021
PH and HCV-4 Family Income and Composition: Interim Reexamination	<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"> • 06/30/2021 	Public Housing and Section 8: Yes -SEMMCHRA will implement this waiver	03/17/2021
PH and HCV-5 EIV System Monitoring	<u>Regulatory Authority</u> § 5.233 <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"> • 06/30/2021 	Public Housing and Section 8: No - SEMMCHRA intends to continue monitoring EIV	
PH and HCV-6 FSS Contract of Participation: Contract Extension	<u>Regulatory Authority</u> § 984.303(d)	<ul style="list-style-type: none"> • Provides for extensions to FSS contract of participation 	<ul style="list-style-type: none"> • 06/30/2021 	CD: Yes – SEMMCHRA will implement this waiver.	03/17/2021
PH and HCV-7 Waiting List: Opening and Closing; Public Notice	<u>Regulatory Authority</u> § 982.206(a)(2) <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"> • 06/30/2021 	Section 8: Yes -SEMMCHRA will implement this waiver	03/17/2021

<p>HQS-1 Initial inspection</p>	<p><u>Statutory Authority</u> Section 8(o)(8)(A)(i), Section 8(o)(8)(C)</p> <p><u>Regulatory Authority</u> § 982.305(a), 982.305(b), 982.405</p>	<ul style="list-style-type: none"> • Changes initial inspection requirements, allowing for owner certification that there are no life-threatening deficiencies • Where self-certification was used, PHA must inspect the unit no later than 1-year anniversary of date of owner's certification • Will include reminder that HQS waiver does not include a waiver of 24 CFR35.15, visual assessment for deteriorated paint 	<ul style="list-style-type: none"> • 06/30/2021 • 1-year anniversary of date of owner's certification 	<p>Section 8: No - SEMMCHRA intends to continue to do initial inspections. See virtual inspections later in this document.</p>	
<p>HQS-2: PBV Pre-HAP Contract Inspections: PHA Acceptance of Completed Units</p>	<p><u>Statutory Authority</u> Section 8(o)(8)(A)</p> <p><u>Regulatory Authority</u> §§ 983.301(b), 983.156(a)(1)</p>	<ul style="list-style-type: none"> • Changes inspection requirements, allowing for owner certification that there are no life-threatening deficiencies • Where self-certification was used, PHA must inspect the unit no later than 1-year anniversary of date of owner's certification 	<ul style="list-style-type: none"> • 06/30/2021 • 1-year anniversary of date of owner's certification 	<p>Section 8 – N/A</p>	
<p>HQS-3 Initial Inspection: Non-Life Threatening Deficiencies (NLT) Option</p>	<p><u>Statutory Authority</u> Section 8(o)(8)(A)(ii)</p> <p><u>Regulatory Authority</u> HOTMA HCV Federal Register Notice January 18, 2017</p>	<ul style="list-style-type: none"> • Allows for extension of up to 30 days for owner repairs of non-life threatening conditions 	<ul style="list-style-type: none"> • 06/30/2021 	<p>Section 8: No - SEMMCHRA will continue its current practices</p>	

<p>HQS-4 HQS Initial Inspection Requirement: Alternative Inspection Option</p>	<p><u>Statutory Authority</u> Section 8(o)(D)</p> <p><u>Regulatory Authority</u> §§ 982.405 (a), 983.103 (d)</p>	<ul style="list-style-type: none"> • 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 1-year anniversary of date of owner’s certification 	<ul style="list-style-type: none"> • 06/30/2021 • 1-year anniversary of date of owner’s certification 	<p>Section 8: Yes – SEMMCHRA intends to adopt the option of virtual inspections</p>	<p>03/17/2021</p>
<p>HQS-5 HQS Inspection Requirement: Biennial Inspections</p>	<p><u>Statutory Authority</u> Section 8(o)(D)</p> <p><u>Regulatory Authority</u> §§ 982.405(a), 983.103(d)</p>	<ul style="list-style-type: none"> • Allows for delay in biennial inspections • PHAs must require owner certification there are no life-threatening deficiencies • All delay biennial inspections must resume by 06/30/2021 and be completed by 12/31/2021 	<ul style="list-style-type: none"> • 06/30/2021 • 12/31/2021 	<p>Section 8: Yes - SEMMCHRA will implement this waiver.</p>	<p>03/17/2021</p>
<p>HQS-6 HQS Interim Inspections</p>	<p><u>Statutory Authority</u> Section 8(o)(8)(F)</p> <p><u>Regulatory Authority</u> §§ 982.405(g), 983.103 (e)</p>	<ul style="list-style-type: none"> • Waives the requirement for the PHA to conduct interim inspection and require alternative method • Allows for repairs to be verified by alternative methods 	<ul style="list-style-type: none"> • 06/30/2021 	<p>Section 8: Yes – SEMMCHRA intends to waive the requirement of an on-site inspection but will complete a virtual inspection and/or have the owner self-certify that repairs were completed in 24 hours.</p>	<p>03/17/2021</p>

HQS-7 PBV Turnover Inspections	<u>Regulatory Authority</u> § 983.103(c)	<ul style="list-style-type: none"> Allows for PBV turnover units to be filled based on owner certification there are no life-threatening deficiencies Allows for delayed full HQS inspection NLT than 1-year anniversary of date of owner's certification 	<ul style="list-style-type: none"> 06/30/2021 1-year anniversary of date of owner's certification 	Section 8 – N/A	
HQS-8: PBV HAP Contract – HQS Inspections to Add or Substitute Units	<u>Statutory Authority</u> Section 8(o)(8)(A) <u>Regulatory Authority</u> §§ 983.207(a), 983.207(b) <u>Sub-regulatory</u> <u>Guidance</u> HOTMA HCV Federal Register Notice January 18, 2017	<ul style="list-style-type: none"> Allows for PBV units to be added or substituted in the HAP contract based on owner certification there are no life-threatening deficiencies Allows for delayed full HQS inspection NLT 1-year anniversary of date of owner's certification 	<ul style="list-style-type: none"> 06/30/2021 1-year anniversary of date of owner's certification 	Section 8 – N/A	
HQS-9 HQS Quality Control Inspections	<u>Regulatory Authority</u> § 982.405(b), 983.103 (e)(3)	<ul style="list-style-type: none"> Provides for a suspension of the requirement for QC sampling inspections 	<ul style="list-style-type: none"> 06/30/2021 	Section 8: Yes – SEMMCHRA will implement this waiver.	03/17/2021
HQS-10 HQS Space and Security	<u>Regulatory Authority</u> § 982.401(d)	<ul style="list-style-type: none"> Waives the requirement that each dwelling unit have at least 1 bedroom or living/sleeping room for each 2 persons 	Remain in effect on year from lease term or date of notice, whichever is longer	Section 8: Yes – SEMMCHRA will implement this waiver.	03/17/2021

HQS-11 Homeownership Option: Initial HQS Inspection	<u>Statutory Authority</u> Section 8(o)(8)(A)(i), Section 8(y)(3)(B) <u>Regulatory Authority</u> § 982.631(a)	<ul style="list-style-type: none"> • Waives the requirement to perform an initial HQS inspection in order to begin making homeownership assistance payments • Requires family to obtain independent professional inspection 	<ul style="list-style-type: none"> • 06/30/2021 	CD: No – SEMMCHRA will continue its usual practice; however, the HQS inspection will be done virtually, if possible.	
HCV-1 Administrative Plan	<u>Regulatory Authority</u> § 982.54 (a)	<ul style="list-style-type: none"> • Establishes an alternative requirement that policies may be adopted without board approval until 3/31/21 • Any provisions adopted informally must be adopted formally by 6/30/21 	<ul style="list-style-type: none"> • 03/31/2021 • 06/30/2021 	Section 8: Yes – SEMMCHRA will implement this waiver	03/17/2021
HCV-2 Information When Family is Selected: PHA Oral Briefing	<u>Regulatory Authority</u> §§ 982.301(a)(1) 983.252(a)	<ul style="list-style-type: none"> • Waives the requirement for an oral briefing • Provides for alternative methods to conduct required voucher briefing 	<ul style="list-style-type: none"> • 06/30/2021 	Section 8: Yes – SEMMCHRA will implement this waiver.	03/17/2021
HCV-3 Term of Voucher – Extension of Term	<u>Regulatory Authority</u> § 982.303(b)(1)	<ul style="list-style-type: none"> • Allows PHAs to provide voucher extensions regardless of current PHA policy 	<ul style="list-style-type: none"> • 06/30/2021 	Section 8: Yes – SEMMCHRA will implement this waiver.	03/17/2021
HCV- 4 PHA Approval of Assisted Tenancy When HAP Contract is Executed	<u>Regulatory Authority</u> § 982.305(c)	<ul style="list-style-type: none"> • Provides for HAP payments for contracts not executed within 60 days • PHA must not pay HAP to owner until HAP contract is executed 	<ul style="list-style-type: none"> • 06/30/2021 	Section 8: Yes – SEMMCHRA will implement this waiver.	03/17/2021

HCV-5 Absence from Unit	<u>Regulatory Authority</u> § 982.312	<ul style="list-style-type: none"> Allows for PHA discretion on absences from units longer than 180 days PHAs must not make HAP payments beyond 12/31/20 for unit vacant more than 180 consecutive days 	<ul style="list-style-type: none"> 06/30/2021 	Section 8: Yes – SEMMCHRA will implement this waiver.	03/17/2021
HCV-6 Automatic Termination of the HAP Contract	<u>Regulatory Authority</u> § 982.455	<ul style="list-style-type: none"> Allows PHA to extend the period of time after the last HAP payment is made before the HAP contracts terminates automatically 	<ul style="list-style-type: none"> 06/30/2021 	Section 8: Yes – SEMMCHRA will implement this waiver.	03/17/2021
HCV-7 Increase in Payment Standard During HAP Contract Term	<u>Regulatory Authority</u> § 982.505©(4)	<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> 06/30/2021 	Section 8: No - SEMMCHRA will continue its current practices.	
HCV-8 Utility Allowance Schedule: Required Review and Revision	<u>Regulatory Authority</u> § 982.517	<ul style="list-style-type: none"> Provides for delay in updating utility allowance schedule 	<ul style="list-style-type: none"> 06/30/2021 	Section 8: No - SEMMCHRA will continue its current practices.	
HCV-9 Homeownership Option: Homeownership Counseling	<u>Statutory Authority</u> Section 8(y)(1)(D) <u>Regulatory Authority</u> § 982.630, 982.636(d)	<ul style="list-style-type: none"> Waives the requirement for the family to obtain pre-assistance counseling 	<ul style="list-style-type: none"> 06/30/2021 	CD: No – SEMMCHRA will continue our current practices.	
HCV-10 FUP	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> Allows PHAs to increase age to 26 for foster youth initial lease up 	<ul style="list-style-type: none"> 06/30/2021 	N/A	N/A
HCV-11 Family Unification Program (FUP): Length of Assistance for Youth	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> Allows PHAs to suspend terminations of assistance for FUP youth who will reach the 36- month limit between April 10, 2020 and December 31, 2020 	<ul style="list-style-type: none"> 06/30/2021 	N/A	N/A

HCV-12 Family Unification Program (FUP): Timeframe for Referral	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> Allows PHAs to accept referrals of otherwise eligible youth who will leave foster care within 120 days 	<ul style="list-style-type: none"> 06/30/2021 	N/A	N/A
HCV-13 Homeownership: Maximum Term of Assistance	<u>Regulatory Authority</u> §§ 983.211 (a); 983.258	<ul style="list-style-type: none"> Allows a PHA to extend homeownership assistance for up to 1 additional year 	<ul style="list-style-type: none"> 06/30/2021 	CD: Yes – SEMMCHRA will implement this waiver	03/17/2021
HCV-14 Mandatory Removal of Unit from PBV HAP Contract	<u>Regulatory Authority</u> §§ 983.211 (a); 983.258	<ul style="list-style-type: none"> Allows a PHA to keep a PBV unit under contract for a period of time that extends beyond 180 from the last HAP but does not extend beyond December 31, 2020 	<ul style="list-style-type: none"> 06/30/2021 	N/A	N/A
PH-1 Fiscal closeout of Capital Grant Funds	<u>Regulatory Authority</u> § 905.322(b)	<ul style="list-style-type: none"> Extension of deadlines for ADCC and AMCC 	<ul style="list-style-type: none"> Varies by PHA 	CD: No – SEMMCHRA will continue our current practices	
PH-2 Total Development Costs	<u>Regulatory Authority</u> § 905.314(c) – (d)	<ul style="list-style-type: none"> Waives the TDC and HCC limits permitting approval of amount in excess of published TDC by 25% to 50% on a case by case basis 	<ul style="list-style-type: none"> Applies to development proposals submitted to HUD no later than December 31, 2021 	N/A	N/A

PH-3 Cost and Other Limitations: Types of Labor	<u>Regulatory Authority</u> § 905.314(j)	<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"> 06/30/2021 	N/A	N/A
PH-4 ACOP	<u>Regulatory Authority</u> § 960.201(c)(1)	<ul style="list-style-type: none"> Establishes an alternative requirement that policies may be adopted without board approval until 3/31/21 Any provisions adopted informally must be adopted by 6/30/21 	<ul style="list-style-type: none"> 03/31/2021 06/30/2021 	Public Housing: Yes – SEMMCHRA will implement this waiver	03/17/2021
PH-5 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"> 06/30/2021 	Public Housing: Yes – SEMMCHRA will implement this waiver	03/17/2021
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 	<ul style="list-style-type: none"> 12/31/2021 	CD: Yes – SEMMCHRA will implement this waiver.	03/17/2021
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 when a delay in the annual reexamination occurs as a result of adoption of waiver PH and HCV-2 	<ul style="list-style-type: none"> 06/30/2021 	Public Housing: No – SEMMCHRA will continue its current practices	

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"> 06/30/2021 	Public Housing – N/A	
PH-9 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"> 06/30/2021 	Public Housing: No –SEMMCHRA will continue its current Practices	
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"> 06/30/2021 	Public Housing: No –SEMMCHRA will continue its current Practices	
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 June 30, 2021 for Plans due to expire between July 2, 2020 and June 30, 2021 	<ul style="list-style-type: none"> 06/30/2021 	CD: No - SEMMCHRA will continue its current Practices	
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"> 12/31/2020 	Public Housing: This waiver has Expired	03/17/2021
PH-13 Over-Income Limit: Termination Requirement	<u>Statutory Authority</u> Section 16(a) as amended by section 103 of HOTMA Implementation Notice: Housing Opportunity Through Modernization Act of 2016: Final Implementation of Public Housing Income Limit, 83 Fed. Reg. 35,490 (July 26, 2018)	<ul style="list-style-type: none"> 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. As an alternative requirement, over-income families will remain in public housing households instead of being terminated and will be charged the applicable FMR as the family’s monthly rental amount 	<ul style="list-style-type: none"> 06/30/2021 	Public Housing: No - SEMMCHRA with current Practices	

PH-14 Annual Choice of Rent	<u>Statutory Authority</u> 42 USC 1437 a(a)(2)(A) <u>Regulatory Authority</u> § 960.253	<ul style="list-style-type: none"> Allows families an additional opportunity to select an income-based or flat rent 	<ul style="list-style-type: none"> 06/30/2021 	Public Housing: No - SEMMCHRA will continue with current practices	
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 request otherwise 	HUD will resume issuing new PHAS scores starting the PHAs with FYE dates of 6/30/21	Public Housing: Yes – SEMMCHRA will implement this waiver	03/17/2021
11b SEMAP	<u>Regulatory Authority</u> 24 CFR Part 985	<ul style="list-style-type: none"> PHA to retain prior year SEMAP score unless request otherwise 	HUD will resume issuing new SEMAP scores starting with PHAs with FYE date of 6/30/21	Section 8: Yes – SEMMCHRA will implement this waiver	03/17/2021
11b-1 SEMAP	<u>Regulatory Authority</u> § 985.105(d)	<ul style="list-style-type: none"> Allows field offices to perform a remote SEMAP confirmatory review instead of an onsite confirmatory review before change a PHA's rating from troubled to standard or high performer 	<ul style="list-style-type: none"> 06/30/2021 	Section 8: Yes – SEMMCHRA will implement this waiver	03/17/2021
11b-2 SEMAP	<u>Regulatory Authority</u> § 985.101(a)	<ul style="list-style-type: none"> Waives the requirement for PHAs to submit an annual SEMAP certification in PIC within 60 days of FYE during the period of time that HUD will roll forward prior year SEMAP scores 	<ul style="list-style-type: none"> 06/30/2021 	Section 8: Yes – SEMMCHRA will implement this waiver	03/17/2021

11c Financial Reporting	<u>Regulatory Authority</u> §§ 5.801©, 5.801(d)(1)	<ul style="list-style-type: none"> Allows for extensions of financial report deadlines 	Varies by PHA FYE		
12a Form HUD 50058	<u>Regulatory Authority</u> 24 CFRPart 908, 982.158 <u>Sub-regulatory Guidance</u> PIH Notices2011-65	<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 	This waiver has expired	Public Housing and Section 8: No - SEMMCHRA will continue its current practices.	
12b Designated Housing Plans: 60-Day Notification	<u>Statutory Authority</u> Section7(e)(1)	<ul style="list-style-type: none"> Allows for HUD to delay notification about designated housing plan 	This waiver has expired		
12c Deadline for reporting Operating and Capital Fund expenditures	<u>Statutory Authority</u> Section9(j) <u>Regulatory Authority</u> § 905.306(d)(5)	<ul style="list-style-type: none"> Provides an 18-month extension 	For all open Capital Fund grants, an 18-month extension from the obligation and expenditure end dates in LOCCS as of April 10, 2020	CD: No – SEMMCHRA will not implement this waiver.	
12d Section 6(j) 1- and 2- Year Substantial Improvement Requirement	<u>Statutory Authority</u> Section 6(j)(3)(B)(ii)	<ul style="list-style-type: none"> For PHAs designated as troubled prior to the date of this Notice that have not received a PHAS Assessment or the first full fiscal year after the initial notice of the troubled-designation, HUD will: (1) evaluate the 1-year substantial improvement benchmark based on the first released score for fiscal years ending on or after June 30, 2022; and (2) toll the evaluation of the 2-year recovery benchmark to the next sequential fiscal year. 	This period of availability for this waiver and alternative requirement: (1) is effective on the date of this notice; and (2) will continue through June 30, 2023, at which time HUD will reevaluate any PH in the process of being evaluated.	CD: No – SEMMCRA will continue with its current practices	