

**BENNINGTON HOUSING AUTHORITY  
UTILIZATION OF HUD COVID-19 WAIVERS AND ALTERNATIVE REQUIREMENTS**

4/16/2020

As a result of the COVID-19 Pandemic, the U.S. Department of Housing and Urban Development has provided Housing Authorities with waivers to certain regulations. This spreadsheet provides information on the waivers and Bennington Housing Authority use of waivers.

Waiver	Statutory Authority	Regulatory Authority	Summary of alternative requirement	Availability Period Ends	Did PHA implement waiver and alternative requirement?	Date of PHA adoption	Notes
1 PH and HCV-1 PHA 5-Year and Annual Plan	Section 5A(a)(1), Section 5A(b)(1), Section 5A(g), Section 5A(h)	§ 903.5(a)(3), 903.5(b)(3), 903.21	Alternative dates for submission	Varies based on FYE	YES	4/10/2020	HCV Five Year Plan will be adopted by Board at May 20 meeting and submitted to HUD in June
			Changes to significant amendment process	7/31/20	NO		
2 PH and HCV-2 Family income and composition – delayed annual reexaminations	Section 3(a)(1)	§ 982.516(a)(1), § 960.257(a)	Permits the PHA to delay the annual reexamination of income and family composition	12/31/2020	YES	4/10/2020	BHA will attempt to complete on time recertification as much as possible.
3 PH and HCV-3 Annual reexamination Income Verification		§ 982.516(a)(1), § 960.257(a)	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 hierarchy, including the use of EIV, and will allow PHAs to consider self-certification as the highest form of income verification	7/31/2020	YES	4/10/2020	BHA will continue to try to use the income hierarchy as much as possible to minimize later possible EIV discrepancies.
			Sub-regulatory Guidance PIH Notice 2018-18	PHAs that implement this waiver will be responsible for addressing material income discrepancies that may arise later			
4 PH and HCV-4 Interim reexaminations	Section 3(a)(1)	§ 5.233(a)(2), 982.516(c)(2), 982.516(c)(2), 960.257(b) and (d) Sub-regulatory Guidance PIH Notice 2018-18	Waives the requirement to use the income verification requirements, including the use of EIV, for interim reexaminations	7/31/2020	YES	4/10/2020	BHA will continue to try to use the income hierarchy as much as possible to minimize later possible EIV discrepancies.
5 PH and HCV-5 EIV System Monitoring		§ 5.233 Sub-regulatory Guidance PIH Notice 2018-18	Waives the mandatory EIV monitoring requirements.	7/31/2020	YES	4/10/2020	BHA will continue EIV monitoring as staff time permits.
7 PH and HCV-7 Waiting List		§ 982.206(a)(2) PIH Notice 2012-34	Waives public notice requirements for opening and closing waiting list Requires alternative process	7/31/2020	NOT APPLICABLE		BHA's Section 8 HCV waiting list is currently open.
8 HQS-1 Initial Inspection	Section 8(o)(8)(A)(i), Section 8(o)(8)(C)	§ 982.305(a), 982.305(b), 982.405	Changes initial inspection requirements, allowing for owner certification that there are no life-threatening deficiencies	7/31/2020	YES	4/10/2020	BHA will continue to conduct Initial Inspections of vacant units, but may, in certain circumstances, accept owner certification.

				Where self-certification was used, PHA must inspect the unit no later than October 31, 2020.	10/31/2020			
9	HQS-2: PBV Pre-HAP Contract Inspection, PHA acceptance of completed units	Section 8(o)(8)(A)	§§ 983.301(b), 983.156(a)(1)	Changes inspection requirements, allowing for owner certification that there are no life-threatening deficiencies	7/31/2020		<b>NOT APPLICABLE</b>	
				Where self-certification was used, PHA must inspect the unit no later than October 31, 2020.	10/31/2020			
10	HQS-3 Non-Life Threatening HQS - Initial Unit Approval	Section 8(o)(8)(A)(ii)	HOTMA HCV Federal Register Notice January 18, 2017	Allows for extension of up to 30 days for owner repairs of non-life threatening conditions	7/31/2020		<b>YES</b>	4/10/2020 BHA will provide extensions if owner certifies inability to due work because of COVID 19 issues.
11	HQS-4 Initial HQS - Alternative Inspections	Section 8(o)(8)(A)(iii)	HOTMA HCV Federal Register Notice January 18, 2017	Under Initial HQS Alternative Inspection Option - allows for commencement of assistance payments based on owner certification there are no life-threatening deficiencies	7/31/2020		<b>YES</b>	4/10/2020 BHA will continue to conduct Initial HQS Inspections, but may in certain circumstances, allow commencement of HAP based on owner certification.
				Where self-certification was used, PHA must inspect the unit no later than October 31, 2020.	10/31/2020			
12	HQS-5 Biennial Inspections	Section 8(o)(D)	§§ 982.405(a), 983.103(d)	Allows for delay in biennial inspections	10/31/2020		<b>NOT APPLICABLE</b>	BHA has no biennial inspections due during the waiver period.
				All delayed biennial inspections must be completed as soon as reasonably possible but by no later than October 31, 2020.				
13	HQS-6 Interim Inspections	Section 8(o)(8)(F)	§§ 982.405(g), §983.103(e)	Waives the requirement for the PHA to conduct interim inspection and requires alternative method	7/31/2020		<b>YES</b>	4/10/2020 Until BHA resumes inspections of occupied units, BHA will accept alternate documentation of HQS repairs.
				Allows for repairs to be verified by alternative methods				
14	HQS-7 PBV Turnover Inspections		§ 983.103(c)	Allows for PBV turnover units to be filled based on owner certification there are no life-threatening deficiencies	7/31/2020		<b>YES</b>	4/10/2020 VSHA, the independent entity, is currently conducting turnover inspections. If that changes, BHA will accept accept property management certification .
				Allows for delayed full HQS inspection	10/31/2020			
16	HQS-9 HQS QC Inspections		§ 982.405(b)	Provides for a suspension of the requirement for QC sampling inspections	10/31/2020		<b>YES</b>	4/10/2020 BHA will not request FY2020 HUD SEMAP score and will, therefore not conduct QC HQS and file reviews in July.

17	HQS--10 HQS Space and Security	§ 982.401(d)	Waives the requirement that each dwelling unit have at least 1 bedroom or living/sleeping room for each 2 persons.	Remains in effect one year from lease term or date of notice, whichever is longer	NO		
19	HCV-1 Administrative Plan	§ 982.54 (a)	Waives the requirement to adopt revisions to the admin plan	7/31/20	NO		
20	HCV-2 PHA Oral Breifing	§ 982.301(a)(3), § 983.252(a)	Waives the requirement for an oral briefing Provides for alternative methods to conduct required voucher briefing	7/31/2020	YES	4/10/2020	BHA will use alternative methods for briefings.
21	HCV-3 Term of Voucher - Extensions of Term	§ 982.303(b)(1)	Allows PHAs to provide voucher extensions regardless of current PHA policy	7/31/2020	NO		BHA will continue to provide voucher extension in accordance with the current Administrative Plan.
22	HCV-4 PHA Approval of Assisted Tenancy	§ 982.305(c)	Provides for HAP payments for contracts not executed within 60 days  PHA must not pay HAP to owner until HAP contract is executed	7/31/2020	NO		
23	HCV-5 Absence from unit	§ 982.312	Allows for PHA discretion on absences from units longer than 180 days  PHAs must not make HAP payments beyond 12/31/20 for units vacant more than 180 consecutive days	12/31/2020	NO		
24	HCV-6 Automatic Termination of the HAP Contract	§ 982.455	Allows PHA to extend the period of time after the last HAP payment is made before the HAP contract terminates automatically.	12/31/2020	NO		
25	HCV-7 Increase in Payment Standard	§ 982.505(c)(4)	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.	12/31/2020	NO		
26	HCV-8 Utility Allowance Schedule	§ 982.517	Provides for delay in updating utility allowance schedule	12/31/2020	YES	4/10/2020	BHA utilizes VSHA utility allowances, so is adopting this waiver in case there is a VSHA delay.
40	11b SEMAP	24 CFR Part 985	PHA to retain prior year SEMAP score unless requests otherwise	HUD will resume issuing new SEMAP scores starting with PHAs with FYE dates of 3/31/21	YES	4/10/2020	BHA will not request a HUD SEMAP score for FY2020
41	11c Financial reporting	§§ 5.801(c), 5.801(d)(1)	Allows for extensions of financial reporting deadlines	Varies by PHA FYE	YES	4/10/2020	BHA's FY2019 financials will be submitted to HUD before 9/30/20.

42 12a Form HUD 50058

24 CFR Part 908, §  
982.158 Sub-  
regulatory Guidance  
PIH Notice 2011-65

Alternative requirement to submit  
within 90 days of the effective date of  
action

Waives the requirement to submit  
50058 within 60 days

12/31/2020

**NO**

4/10/2020

BHA will continue to submit  
50058s within sixty days of the  
effective date.