Addendum for COVID-19 Response

This Addendum provides a list of waivers adopted by the Fairfax County Redevelopment and Housing Authority as authorized in HUD Notice PIH 2020-33 issued on November 30, 2020. Through the Coronavirus Aid, Relief and Economic Security (CARES) Act (Public Law 116-136), HUD has waived and established alternative requirements in response to the COVID-19 national emergency. The waivers listed below are intended to provide administrative flexibility and have been approved by the HUD MTW Office or have been authorized by the administrative authority as stated in HUD Notice 2020-33.

NOTE: On April 10, 2020, HUD published Notice PIH 2020-05 which initially established many of the waivers listed below in response to the COVID-19 pandemic. PIH Notice 2020-13 was then published by HUD on July 2, 2020, which restated the waivers and alternative requirements previously established. Subsequently, HUD published PIH 2020-33 on November 30, 2020 which restates waivers and alternative requirements outlined in PIH Notice 2020-13, adds new waivers and alternative requirements, and continues information previously outlined by HUD. PIH Notice 2020-33 also incorporates waivers issued due to the COVID-19 pandemic for Mainstream Vouchers and the Mod Rehab Program.

A copy of this Addendum was posted to the Fairfax County Redevelopment and Housing Authority on 12/29/20.

Item	Statutory and regulatory waivers	Other Local Activities as Authorized by HUD MTW Office	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	Statutory Authority Section 5A(a)(1), Section 5A(b)(1), Section 5A(g), Section 5A(h)(2) Regulatory Authority §§ 903.5(a)(3), 903.5(b)(3), 903.13(c), 903.21, 903.23	MTW Office provided the FCRHA flexibility to submit the FY2021 MTW Plan by 9/30/20.	 Alternative dates for submission Changes to significant amendment process 	Varies based on FYE12/31/20	No – The FCRHA utilized MTW flexibility	N/A
PH and HCV-2 Family Income and Composition: Delayed Annual Examinations	Statutory Authority Section 3(a)(1) Regulatory Authority §§ 982.516(a)(1), 960.257(a)		 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 	• 6/30/21	No	N/A

PH and HCV-3	Regulatory Authority	Waives the	• 6/30/21	Yes	4/10/20
Family Income	§§ 5.233(a)(2), 960.259(c),	requirements to use	,,,,,,		
and Composition:	982.516(a)	the income			
Annual		hierarchy, including			
Examination;	Sub-regulatory	the use of EIV, and			
Income	Guidance	will allow PHAs to			
Verification	PIH Notice 2018-18	consider self-			
Requirements		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	Statutory Authority	Waives the	• 6/30/21	Yes	4/10/20
Family Income	Section 3(a)(1)	requirement to			
and Composition:		use the income			
Interim	Regulatory Authority	verification			
Examinations	§§ 5.233(a)(2),	requirements,			
	982.516(c)(2),	including the use			
	960.257(a), (b) and	of EIV, for interim			
	(d), 960.259(c)	reexaminations			
	Sub regulatory				
	Sub-regulatory				
	Guidance PIH Notice 2018-18				
	LIU MOTICE 5019-19				

PH and HCV-5 Enterprise Income Verification (EIV) Monitoring	Regulatory Authority § 5.233 Sub-regulatory Guidance PIH Notice 2018-18	Waives the mandatory EIV monitoring requirements.	• 6/30/21	Yes – except for Deceased Tenant Report	4/10/20
PH and HCV-6 Family Self- Sufficiency (FSS) Contract of Participation: Contract Extension	Regulatory Authority § 984.303(d)	Provides for extensions to FSS contract of participation	• 6/30/21	Yes	4/10/20
PH and HCV-7 Waiting List: Opening and Closing; Public Notice	Regulatory Authority § 982.206(a)(2) Sub-regulatory Guidance PIH Notice 2012-34	 Waives public notice requirements for opening and closing waiting list Requires alternative process 	• 6/30/21	Yes	4/10/20

HQS-1	Statutory Authority	Changes initial	• 6/30/21	No	N/A
Initial Inspection	Section 8(o)(8)(A)(i),	inspection	• 1-year		
Requirements	Section 8(o)(8)(C)	requirements,	anniversary of		
		allowing for owner	date of		
	Regulatory Authority	certification that	owner's		
	§§ 982.305(a), 982.305(b),	there are no life-	certification		
	982.405	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 CFR			
		35.15, visual			
		assessment for			
		deteriorated			
		paint.			

HQS-2: Project- Based Voucher (PBV) Pre-HAP Contract Inspections: PHA Acceptance of Completed Units	Statutory Authority: Section 8(o)(8)(A) Regulatory Authority: §§ 983.103(b), 983.156(a)(1)	 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 	6/30/21 1-year anniversary of date of owner's certification	No	N/A
HQS-3 Initial Inspection: Non- Life- Threatening Deficiencies (NLT) Option	Statutory Authority Section 8(o)(8)(A)(ii) Sub-regulatory Guidance HOTMA HCV Federal Register Notice January 18, 2017	 Allows for extension of up to 30 days for owner repairs of non-life threatening conditions 	• 6/30/21	Yes, but only for homeownership vouchers	4/10/20

HQS-4 <u>Statutory Authority</u>	Under Initial HQS	• 6/30/21	No	N/A
HQS Initial Section 8(o)(8)(A)(iii)	Alternative			
Inspection	Inspection Option -	• 1-year		
Requirement: <u>Sub-regulatory</u>	allows for	anniversary		
Alternative <u>Guidance</u>	commencement of	of date of		
Inspection HOTMA HCV Federal	assistance payments	owner's		
Option Register Notice Janu	based on owner	certification		
18, 2017	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.			

HQS-5 HQS Inspection Requirement: Biennial Inspections Statutory Authority Section 8(o)(D) Regulatory Authority §§ 982.405(a), 983.103(d)	• FY 2020 MTW Plan Technical Amendment (MTW Activity 2014-3)	 Allows for delay in biennial inspections PHAs must require owner certification that there are no life-threatening deficiencies All delayed biennial inspections must resume by 6/30/21 and be completed by 12/31/21. 	Waiver and
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HQS-6 HQS Interim Inspections	Statutory Authority Section 8(o)(8)(F) Regulatory Authority §§ 982.405(g), 983.103(e)	 Waives the requirement for the PHA to conduct interim inspection and requires alternative method Allows for repairs to be verified by alternative methods. 	• 6/30/21	Yes	4/10/20
HQS-7 PBV Turnover Unit Inspections	Regulatory Authority § 983.103(c)	 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. 	• 6/30/21 • 1-year anniversary of date of owner's certification	Yes	4/10/20

HQS-8: PBV HAP Contract: HQS Inspections to Add or Substitute Units	Statutory Authority Section 8(o)(8)(A) Regulatory Authority §§ 983.207(a), 983.207(b) Sub-regulatory Guidance HOTMA HCV Federal Register Notice January 18, 2017	 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 	• 6/30/21 • 1-year anniversary of date of owner's certification (originally at 10/31/20)	Yes	4/10/20
HQS-9 HQS Quality Control Inspections	Regulatory Authority §§ 982.405(b), 983.103(e)(3)	 Provides for a suspension of the requirement for QC sampling inspections 	• 6/30/21	Yes	4/10/20

HQS-10 Housing Quality Standards: Space and Security	Regulatory Authority § 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 this Notice, whichever is longer	No	N/A
HQS-11 Homeownership Option: Initial HQS Inspection	Statutory Authority Section 8(o)(8)(A)(i), Section 8(y)(3)(B) Regulatory Authority § 982.631(a)	 Waives the requirement to perform an initial HQS inspection in order to begin making homeownership assistance payments Requires family to obtain independent professional inspection 	• 6/30/21	Yes	4/10/20

HCV-1 Administrative Plan	Regulatory Authority § 982.54(a)	 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 	• 3/31/21 • 6/30/21	Yes	4/10/20
HCV-2 Information When Family is Selected: PHA Oral Briefing	Regulatory Authority §§ 982.301(a)(1), 983.252(a)	 Waives the requirement for an oral briefing Provides for alternative methods to conduct required voucher briefing 	• 6/30/21	No	N/A
HCV-3 Term of Voucher: Extensions of Term	Regulatory Authority § 982.303(b)(1)	Allows PHAs to provide voucher extensions regardless of current PHA policy	• 6/30/21	Yes	4/10/20

HCV-4 PHA Approval of Assisted Tenancy: When HAP Contract is Executed	Regulatory Authority § 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 	• 6/30/21	Yes	4/10/20
HCV-5 Absence from Unit	Regulatory Authority § 982.312	 Allows for PHA discretion on absences from units longer than 180 days PHAs must not make HAP payments beyond 6/30/21 for units vacant more than 180 consecutive days 	• 6/30/21	Yes	4/10/20
HCV-6 Automatic Termination of HAP Contract	Regulatory Authority § 982.455	Allows PHA to extend the period of time after the last HAP payment is made before the HAP contract terminates automatically.	• 6/30/21	Yes	4/10/20

HCV-7 Increase in Payment Standard During HAP Contract Term	Regulatory Authority § 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.	• 6/30/21	No	N/A
HCV-8 Utility Allowance Schedule: Required Review and Revision	Regulatory Authority § 982.517	Provides for delay in updating utility allowance schedule	• 6/30/21	No	N/A
HCV-9 Homeownership Option: Homeownership Counseling	Statutory Authority Section 8(y)(1)(D) Regulatory Authority §§ 982.630, 982.636(d)	Waives the requirement for the family to obtain preassistance counseling	• 6/30/21	No	N/A
HCV-10 Family Unification Program (FUP): FUP Youth Age Eligibility to Enter HAP Contract	Statutory Authority Section 8(x)(2)	Allows PHAs to increase age to 26 for foster youth initial lease up	• 6/30/21	Yes	4/10/20

HCV-11 Family Unification Program (FUP): Length of Assistance for Youth	Statutory Authority Section 8(x)(2)	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	• 6/30/21	Yes	7/2/20
HCV-12 Family Unification Program (FUP): Timeframe for Referral	Statutory Authority Section 8(x)(2)	Allows PHAs to accept referrals of otherwise eligible youth who will leave foster care within 120 days	• 6/30/21	Yes	7/2/20
HCV-13 Homeownership: Maximum Term of Assistance	Regulatory Authority § 982.634(a)	Allows a PHA to extend homeownership assistance for up to 1 additional year	• 6/30/21	Yes	7/2/20

HCV-14 Mandatory Removal of Unit from PBV HAP Contract	Regulatory Authority §§ 983.211(a); 983.258	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	• 6/30/21	Yes	7/2/20
		extend beyond			
		December 31, 2020			

Modify the Calculation	MTW Activity	FY 2020 MTW Plan	• Excludes asset	Yes –Technical	4/10/20
of the Family Share of		Technical	income from income	Amendment to	
Rent for the Housing		Amendment (MTW	calculations for	FY2020 MTW	
Choice Voucher		Activity 2018A-1)	families with assets	Plan	
Program			under \$50,000 and		
			accepts self-		
			certifications.		
			Simplifies income		
			verification by		
			accepting		
			documentation that		
			is up to 120 days old		
			and by accepting self-		
			certifications from		
			program participants		
			with income		
			decreases.		
			Simplifies		
			medical/disability		
			expense		
			deductions by		
			allowing for self-		
			certification up to		
			\$1,000.		
Deal attacks	NATINAL A SILL LI	EV2020 NATIAL DI		V T. d. d. l	4/40/20
Reduction in	MTW Activity	FY2020 MTW Plan	Non work-able	Yes –Technical	4/10/20
Frequency of		Technical	households will	Amendment to	
Reexaminations – Non		Amendment (MTW	move to a five-year	FY 2020 MTW	
Work-Able Households		Activity 2014-1)	reexamination	Plan	
			schedule. This		
			change will impact		
			reexaminations		
			beginning June		
			2020.		

PH-1 Fiscal Closeout of Capital Grant Funds	Regulatory Authority § 905.322(b)	Extension of deadlines for ADCC and AMCC	Varies by PHA	N/A	N/A
PH-2 Total Development Costs	Regulatory Authority § 905.314(c) - (d)	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	N/A	N/A
PH-3 Cost and Other Limitations: Types of Labor	Regulatory Authority § 905.314(j)	Allows for the use of force account labor for modernization activities in certain circumstances	• 6/30/21	N/A	N/A

PH-4 ACOP: Adoption of Tenant Selection Policies	Regulatory Authority § 960.202(c)(1)	 Establishes an alternative requirement that policies may be adopted without board approval Any provisions adopted informally must be adopted formally NLT December 31, 2020 	• 3/31/21 • 6/30/21	N/A	N/A
PH-5 Community Service and Self- Sufficiency Requirement (CSSR)	Statutory Authority Section 12(c) Regulatory Authority §§ 960.603(a) and 960.603(b)	 Temporarily suspends CSSR 	• 6/30/21	N/A	N/A
PH-6 Energy Audits	Regulatory Authority § 965.302	Allows for delay in due dates of energy audits	• 12/31/21	N/A	N/A

PH-7 Over-Income Families	Statutory Authority Section 16(a)(5) Sub-regulatory Guidance Housing Opportunity Through Modernization Act of 2016: Final Implementation of the Public Housing Income Limit 83 FR 35490, Notice PIH 2019-11	Changes to timeframes for determination of over-income	• 6/30/21	N/A	N/A
PH-8 Resident Council Elections	Regulatory Authority § 964.130(a)(1)	Provides for delay in resident council elections	• 6/30/21	N/A	N/A
PH-9 Review and Revision of Utility Allowance	Regulatory Authority § 965.507	Provides for delay in updating utility allowance schedule	• 6/30/21	N/A	N/A

PH-10 Tenant Notifications for Changes to Project Rules and Regulations	Regulatory Authority § 966.5	Advance notice not required except for policies related to tenant charges	• 6/30/21	N/A	N/A
PH-11: Designated Housing Plan Renewals	Statutory Authority: Section 7(f)	• 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.	• 6/30/21	N/A	N/A
PH-12: Public Housing Agency Annual Self- Inspections	Statutory Authority: Section 6(f)(3) Regulatory Authority: § 902.20(d)	 Waives the requirement that the PHA must inspect each project 	• 12/31/20	N/A	N/A

PH-13: Over-Income	Statutory Authority	Waives the	• 6/30/21	N/A	N/A
Limit: Termination	Section 16(a) as	requirement that	, ,		
Requirement	amended by section	a family whose			
	103 of HOTMA	income has			
		exceeded the			
	Implementation Notice:	over-income limit			
	Housing Opportunity	for the locality for			
	Through Modernization	two consecutive			
	Act of 2016: Final	years be			
	Implementation of	terminated within			
	Public Housing Income	6 months of the			
	Limit, 83 Fed. Reg.	third income			
	35,490 (July 26, 2018)	determination			
		As an alternative			
		requirement,			
		over-income			
		families will			
		remain public			
		housing			
		households			
		instead of being			
		terminated and			
		will be charged			
		the applicable			
		FMR as the			
PH-14: Annual	Statutory Authority	family's monthly Allows families an	- 6/20/24	N/A	N/A
Choice of Rent	Statutory Authority:	additional	• 6/30/21	IN/A	IN/A
Choice of Kerit	42 USC 1437a(a)(2)(A)				
	Pagulatory Authority	opportunity to			
	Regulatory Authority	select an income- based or flat rent			
	§ 960.253	nasen oi iial lelil			

11a PHAS	Regulatory Authority 24 CFR Part 902		 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 6/30/21	N/A	N/A
11b SEMAP	Regulatory Authority 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 6/30/21	N/A	N/A

11b-1 SEMAP	Regulatory Authority § 985.105(d)		Allows field offices to perform a remote SEMAP confirmatory review instead of an onsite confirmatory review before changing a PHA's rating from troubled to standard or high performer	• 6/30/21	N/A	N/A
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11b-2 SEMAP	Regulatory Authority § 985.101(a)	•	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	• 6/30/21	N/A	N/A
11c Uniform Financial Reporting Standards: Filing of Financial Reports; Reporting Compliance Dates	Regulatory Authority §§ 5.801€, 5.801(d)(1)		Allows for extensions of financial reporting deadlines		N/A	N/A

12a PHA Reporting Requirements on HUD Form 50058	Regulatory Authority 24 CFR Part 908, § 982.158 Sub-regulatory Guidance PIH Notice 2011-65	 Waives the requirement to submit 50058 within 60 days Alternative requirement to submit within 90 days of the effective date of action 	• 12/31/20	Yes	4/10/20
12b Designated Housing Plans: HUD 60-Day Notification	Statutory Authority Sectio€(e)(1)	Allows for HUD to delay notification about designated housing plan	• 7/31/20	N/A	N/A
Extension of Deadline for Programmatic Obligation and Expenditure of Capital Funds	Statutory Authority Section 9(j) Regulatory Authority § 905.306(d)(5)	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	N/A	N/A

12d Section 6(j) 1- and 2- Year Substantial Improvement Requirements	Statutory Authority Section 6(j)(3)(B)(ii) Regulatory Authority 24 CFR § 902.75(d)	• For PHAs designated as troubled prior to the date of this Notice that have not received a PHAS assessment for 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	The 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 additional impacts of this waiver on any PHA in the process of being evaluated.	N/A	N/A
MR-1 Family Income and Composition: Delayed Annual Examination	Statutory Authority Section 3(a)(1) Regulatory Authority 24 CFR § 882.515(a)	Waives statutory and regulatory requirement to permit PHAs to delay annual reexaminations of Mod Rehab families	• 6/30/21	N/A	N/A

	Waives the	• 6/30/21	N/A	N/A
	requirements to			
	use the income			
ce	hierarchy described			
	by Notice PIH 2018-			
	18 and will allow			
	PHAs to forgo third			
	party income			
	verification			
	requirements for			
	annual			
	reexaminations,			
	including the use of			
	EIV, if the PHA			
	wishes to conduct			
	family's annual			
	reexam as			
	· ·			
	MR-1			
n	nce	use the income hierarchy described by Notice PIH 2018- 18 and will allow PHAs to forgo third party income verification requirements for annual reexaminations, including the use of EIV, if the PHA wishes to conduct the annual reexam rather than delaying the family's annual	use the income hierarchy described by Notice PIH 2018- 18 and will allow PHAs to forgo third party income verification requirements for annual reexaminations, including the use of EIV, if the PHA wishes to conduct the annual reexam rather than delaying the family's annual reexam as permitted under	use the income hierarchy described by Notice PIH 2018- 18 and will allow PHAs to forgo third party income verification requirements for annual reexaminations, including the use of EIV, if the PHA wishes to conduct the annual reexam rather than delaying the family's annual reexam as permitted under

MR-3	Statutory Authority	Waives	• 6/30/21	N/A	N/A
Family Income	Section 3(a)(1)	requirements to	0,30,22	•	,
and	` ` ` ` `	use the income			
Composition:	Regulatory Authority	verification			
Interim	24 CFR §§ 5.233(a)(2),	hierarchy as			
Examinations	882.515(b)	described by Notice			
		PIH 2018-18. Allows			
	Sub-regulatory Guidance	PHAs to forgo third-			
	Notice PIH 2018-18	party income			
		verification			
		requirements for			
		interim reexams,			
		including the			
		required use of EIV			
		During the			
		allowable period of			
		eligibility, PHAs			
		may consider self-			
		certification as the			
		highest form of			
		income verification			
		to process interim			
MR-4	Regulatory Authority	Waiving the	• 6/30/21	N/A	N/A
Enterprise	§ 5.233	mandatory EIV	,,,,,,		·
Income		monitoring			
Verification	Sub-regulatory Guidance	requirements.			
(EIV)	Notice PIH 2018-18	requirements.			
Monitoring					
3.3					

MR-5 PHA Inspection Requirement: Annual Inspections	Regulatory Authority § 882.516(b)	 Waives the annual inspection requirement and allows PHAs to delay annual inspections for Mod Rehab units All delayed annual inspections must be completed as soon as reasonably possible but no later than one year after the date the annual inspection would have been required absent the 	• 6/30/21	N/A	N/A
MR-6 Adjustment of Utility Allowance	Regulatory Authority § 882.510	Waives the requirement to allow PHAs to delay the review and update of utility allowances	• 6/30/21	N/A	N/A

MS-1 Mainstream Initial Lease Term	Statutory Authority Section 8(o)(7)(A) Regulatory Authority § 982.309(a)(2)(ii)	PHA may englease terms than one year regardless of the shorter term is a promarket praction.	of less ear of whether lease evailing	Yes	9/8/20
MS-2 Mainstream Criminal Background Screening	Statutory Authority 42 U.S.C. 13663(a), 42 U.S.C. 13661 Regulatory Authority §§ CFR 5.856, 982.553(a)	PHAs may eas an altern requirement screening requirement applicants of Mainstream vouchers we distinct from in place for program in	ative at, ats for a for	No	N/A
MS-3 Mainstream Age Eligibility to Enter HAP Contract Statutory Authority	Statutory Authority 42 U.S.C. 8013(k)(2)	• As an altern requirement PHA may che expand the definition of eligible non family members include those were issued voucher print turning 62 and were not yet the effective of the HAP	of, the noose to If an and an	Yes	9/8/20