

**Summary of Housing Authority of the City of Austin's (HACA)
Public Housing and Housing Choice Voucher (HCV) Waivers and Alternative Requirements**

This chart summarizes the waivers authorized under NOTICE PIH 2020-33 COVID-19 Statutory and Regulatory Waivers for the Public Housing, Housing Choice Voucher (Including Mainstream and Mod Rehab), Indian Housing Block Grant and Indian Community Development Block Grant programs, Suspension of Public Housing Assessment System and Section Eight Management Assessment Program, Revision 2.

In Notice PIH 2020–05, published on April 10, 2020, HUD exercised its authority under the CARES Act to establish waivers and administrative flexibilities to provide relief to Public Housing Agencies (PHAs), Indian tribes, and tribally designated housing entities (TDHEs) in response to the COVID-19 pandemic. PIH subsequently published Notice PIH 2020-13, which restated the waivers and alternative requirements established previously in Notice PIH 2020–05, provided additional waivers and alternative requirements, extended the periods of availability for previously established waivers and alternative requirements, and issued technical amendments to several of the previously established waivers and alternative requirements.

Additionally, HUD published Notices PIH 2020-20 and PIH 2020-22, which provided waivers and alternative requirements specific to the Section 8 Moderate 2 Rehabilitation (Mod Rehab) Program and Mainstream vouchers, respectively. This Notice restates the waivers and alternative requirements included previously in Notice PIH 2020-13, carries forward information on previously specified HUD actions, adds new waivers and alternative requirements, and incorporates the waivers and alternative requirements for Mainstream vouchers and the Mod Rehab Program.

In addition, this Notice extends the period of availability of certain waivers, such as those related to Income Verification and Annual Examinations, until June 30, 2021. PHAs must keep written documentation on the waivers applied by the PHA as well as the effective dates. To fulfill those requirements, this chart summarizes waivers HACA implemented with the adoption dates and extension dates.

Please note that as of 11/30/2020, HACA completed the conversion of its entire Public Housing portfolio to RAD PBRA. All Public Housing waivers that HACA chose to apply were only in effect through that date.

#	Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period End	Did PHA implement waiver and alternative requirement?	Date of PHA adoption
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1	PH and HCV-1 PHA 5-Year and Annual Plan	<u>Statutory Authority</u> Section 5A(a)(1), Section 5A(b)(1), Section 5A(g), Section 5A(h) <u>Regulatory Authority</u> § 903.5(a)(3), 903.5(b)(3), 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 12/30/20 	NO	
2	PH and HCV-2 Family income and composition – delayed annual reexams	<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"> 6/30/2021 <p>All reexams due in CY 20 must be completed by 12/31/2020 Reexams due between 1/1/21 and 6/30/21 need to be completed by 6/30/2021</p>	YES	4/10/2020
3	PH and HCV-3 Annual reexam income verification	<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 allow PHAS to consider self-certification as the highest form of income verification 	<ul style="list-style-type: none"> 6/30/2021 	YES	4/10/2020
4	PH and HCV-4 Interim reexaminations	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> § 5.233(a)(2), 982.516(c)(2), 960.257 (a),(b)(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"> 6/30/2021 	YES	4/10/2020

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5	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"> • 6/30/2021 	YES	4/10/2020
6	PH and HCV-6 FSS Contract of Participation	<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"> • 6/30/2021 	YES	4/10/2020
7	PH and HCV-7 Waiting List	<u>Regulatory Authority</u> § 982.206(a)(2) 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"> • 6/30/2021 	NO	
8	HQS-1 Initial inspection	<u>Statutory Authority</u> Section 8(o)(8)(A)(i), Section 8(o)(8)(C) <u>Regulatory Authority</u> § 982.305(a), 982.305(b), 982.405	<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. 	1-year anniversary of date of owner's certification.	YES	4/10/2020
9	HQS-2: PBV Pre-HAP Contract Inspections, PHA acceptance of completed units	<u>Statutory Authority:</u> Section 8(o)(8)(A) <u>Regulatory Authority:</u> §§ 983.301(b), 983.156(a)(1)	<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 owner's certification. 	1-year anniversary of date of owner's certification.	NO	
10	HQS-3 Non-Life Threatening HQS - Initial Unit Approval	<u>Statutory Authority</u> Section 8(o)(8)(A)(ii) <u>Regulatory Authority</u> HOTMA HCV Federal Register Notice January 18, 2017	<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"> • 6/30/2021 	YES	4/10/2020

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11	HQS-4 Initial HQS - Alternative Inspections	<u>Statutory Authority</u> Section 8(o)(8)(A)(iii) <u>Regulatory Authority</u> HOTMA HCV Federal Register Notice January 18, 2017	<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 1-year anniversary of date of owner's cert. 	1-year anniversary of date of owner's certification.	YES	4/10/2020
12	HQS-5 Biennial Inspections	<u>Statutory Authority</u> Section 8(o)(D) <u>Regulatory Authority</u> §§ 982.405(a), 983.103(d)	<ul style="list-style-type: none"> Allows for delay in biennial inspections PHAs must require owner certification if there are no life-threatening deficiencies All delayed biennial inspections must resume by 6/30/21 and be completed by 12/31/2021 	<ul style="list-style-type: none"> 6/30/2021 12/31/2021 	YES	4/10/2020
13	HQS-6 Interim Inspections	<u>Statutory Authority</u> Section 8(o)(8)(F) <u>Regulatory Authority</u> §§ 982.405(g), § 983.103(e)	<ul style="list-style-type: none"> Waives the requirement for the PHA to conduct interim inspection and requires alternative method Allows for repairs to be verified by alternative methods 	6/30/2021	YES	4//10/2020
14	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 	<ul style="list-style-type: none"> 6/30/2021 1 year of date of owner's certification	YES	4/10/2020

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15	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)	<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 owner cert. 	<ul style="list-style-type: none"> 6/30/2021 <p>1-year anniversary of date of owner's certification.</p>	NO	4/10/2020
16	HQS-9 HQS QC Inspections	Regulatory Authority § 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"> 6/30/2021 	YES	4/10/2020
17	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. 	<ul style="list-style-type: none"> Remains in effect one year from lease term or date of notice, whichever is longer 	NO	
18	HQS-11 Homeownership HQS	<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"> 6/30/2021 	NA	
19	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 3/21/21 Any provisions adopted informally must be adopted formally by 6/30/21 	<ul style="list-style-type: none"> 3/31/2021 6/30/2021 	YES	4/10/2020

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20	HCV-2 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 	• 6/30/2021	YES	4/10/2020
21	HCV-3 Term of Voucher - Extensions 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. 	• 6/30/2021	YES	4/10/2020
22	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 	• 6/30/2021	YES	4/10/2020
23	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 units vacant more than 180 consecutive days. 	• 6/30/2021	YES	4/10/2020
24	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 contract terminates automatically. 	• 6/30/2021	YES	4/10/2020

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25	HCV-7 Increase in Payment Standard during HAP Contract term	<u>Regulatory Authority</u> § 982.505(c)(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"> 6/30/2021 	YES	4/10/2020
26	HCV-8 Utility Allowance Schedule required review & 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"> 6/30/2021 	YES	4/10/2020
27	HCV-9 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"> 6/30/2021 	N/A	
28	HCV-10 FUP youth age eligibility to enter HAP Contract	<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"> 6/30/2021 	YES	4/10/2020
29	HCV-11 FUP youth length of assistance for youth	<u>Statutory Authority</u> Section 8(x)(2)	Allows PHAs to suspend terminations of assistance for FUP youth who will reach the 36-month limit between 4/10/2020 and 6/30/2021	<ul style="list-style-type: none"> 6/30/2021 	YES	11/30/2020

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30	HCV-12 FUP timeframe for referral	<u>Statutory Authority</u> Section 8(x)(2)	Allows PHAs to accept referrals of otherwise eligible youth who will leave foster care within 120 days	<ul style="list-style-type: none"> 6/30/2021 	YES	11/30/2020
31	HCV-13 Homeownership Maximum term of assistance				NA	
32	HCV-14 Mandatory removal of unit from PBV HAP Contract	<u>Regulatory Authority</u> § 983.211 (a), 983.258	Allows a PHA to keep a PBV unit under contract for a period of time that extends beyond 180 days from last HAP	<ul style="list-style-type: none"> 6/30/2021 	NO	
33	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 	NO	N/A
34	PH-2 Total Development Costs	<u>Regulatory Authority</u> § 905.314(c)	<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 	<ul style="list-style-type: none"> Applies to development proposals submitted to HUD no later than December 31, 2021 	NO	N/A

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35	PH-3 Cost limitations	<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"> 6/30/2021 	NO	N/A
36	PH-4 ACOP: Adoption of Tenant Selection Policies	<u>Regulatory Authority</u> § 960.202(c)(1)	<ul style="list-style-type: none"> Establishes an alternative requirement that policies may be adopted without board approval until 3/31/21 provisions must be formally adopted by 6/30/2021 	<ul style="list-style-type: none"> 3/31/2021 6/30/2021 	YES	4/10/2020
37	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"> 6/30/2021 	YES	4/10/2020
38	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 	NO	N/A
39	PH-7 Over-income families	Housing Opportunity Through Modernization Act of 2016: Final Implementation of the Public Housing Income Limit 83 FR 35490 Notice: Notice PIH 2019-11	<ul style="list-style-type: none"> Changes to timeframes for determination of over-income when a delay in the annual reexam occurs as a result of adoption of waiver PH and HCV-2 	<ul style="list-style-type: none"> 6/30/2021 	NO	N/A

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40	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"> 6/30/2021 	YES	4/10/2020
41	PH-9 Utility Allowance Revisions	<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"> 6/30/2021 	NO	N/A
42	PH-10 Tenant notifications	<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"> 6/30/2021 	NO	N/A
43	PH-11 Designated Housing Plan Renewals	<u>Statutory Authority</u> Section 7 (f)	Extends the Plan's effective period through 6/30/2021 for Plans due to expire between 7/2/2020 and 6/30/2021	<ul style="list-style-type: none"> 6/30/2021 	N/A	N/A
44	PH-12 Public Housing Agency Annual Self-Inspections	Statutory Authority Section 6(f)(3) <u>Regulatory Authority</u> § 902.20(d)	Waives the requirement that the PHA must inspect each project	<ul style="list-style-type: none"> 12/31/2020 	YES	7/2/2020

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45	PH-13 Over-Income Limit: Termination Requirement	Statutory Authority 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 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"> • 6/30/2021 	N/A	N/A
46	PH-14 Annual Choice of Rent	Statutory Authority: 42 USC 1437a(a)(2)(A) Regulatory Authority § 960.253	Allows families an additional opportunity to select an income-based or flat rent	<ul style="list-style-type: none"> • 6/30/2021 	N/A	N/A
47	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 	<ul style="list-style-type: none"> • HUD will resume issuing new PHAS scores starting with PHAS with FYE dates of 6/30/2021 	N/A	N/A
48	11b SEMAP	<u>Regulatory Authority</u> 24 CFR Part 985	<ul style="list-style-type: none"> • PHA to retain prior year SEMAP score unless requests otherwise 	HUD will resume issuing new SEMAP scores starting with PHAs with FYE dates of 6/30/2021	YES	4/10/2020

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49	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	<ul style="list-style-type: none"> 6/30/2021 	N/A	N/A
50	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	<ul style="list-style-type: none"> 6/30/2021 	YES	4/10/2020
51	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 	<ul style="list-style-type: none"> Varies by PHA FYE 	YES	4/10/2020
52	12a Form HUD 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"> 12/31/2020 	YES	4/10/2020
53	12b Designated housing plan	<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"> 7/31/2020 	N/A	N/A

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54	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 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 4/10/ 2020	YES	4/10/2020
55	MR-1 Family Income/ 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	<ul style="list-style-type: none"> 6/30/2021 	YES	11/30/2020
56	MR-0 Family Income and Composition: Annual examination; Income Verification Requirements	<u>Regulatory Authority:</u> §5.233(a)(2) <u>Sub-regulatory Guidance</u> Notice PIH 2018-18	<ul style="list-style-type: none"> Waives the requirements to 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-1 	<ul style="list-style-type: none"> 6/30/2021 	YES	11/30/2020
57	MR-3 Family Income and Composition: Interim Examinations	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> 24 CFR §§ 5.233(a)(2), 882.515(b) <u>Sub-regulatory Guidance</u> Notice PIH 2018-18	<ul style="list-style-type: none"> Waives requirements to use the income verification hierarchy as described by Notice PIH 2018-18. Allows PHAs to forgo third-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 reexams 	<ul style="list-style-type: none"> 6/30/2021 	YES	11/30/2020

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58	MR-4 Enterprise Income Verification (EIV) Monitoring	Regulatory Authority § 5.233 Sub-regulatory Guidance Notice PIH 2018-18	Waiving the mandatory EIV monitoring requirements.	• 6/30/2021	YES	11/30/2020
59	MR-5 PHA Inspection Requirement: Annual Inspection	Regulatory Authority § 882.516(b)	<ul style="list-style-type: none"> • 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 waiver 	• 6/30/2021	YES	11/30/2020
60	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	• 6/30/2021	YES	11/30/2020
61	MS-1 Mainstream Initial Lease Term	<u>Statutory Authority</u> Section 8(o)(7)(A) <u>Regulatory Authority</u> § 982.309(a)(2)(ii)	PHA may enter initial lease terms of less than one year regardless of whether the shorter lease term is a prevailing market practice	• 6/30/2021	YES	11/30/2020

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62	MS-2 Mainstream Criminal Background Screening	<u>Statutory Authority</u> 42 U.S.C. 13663(a), 42 U.S.C. 13661 <u>Regulatory Authority</u> §§ CFR 5.856, 982.553(a)	PHAs may establish, as an alternative requirement, screening requirements for applicants for Mainstream vouchers which are distinct from those in place for its HCV program in general	<ul style="list-style-type: none"> 6/30/2021 	YES	11/30/2020
63	MS-3 Mainstream Age Eligibility to Enter HAP Contract Statutory Authority	Statutory Authority 42 U.S.C. 8013(k)(2)	As an alternative requirement, the PHA may choose to expand the definition of an eligible non-elderly family member to include those who were issued a voucher prior to turning 62 and were not yet 63 on the effective date of the HAP Contract	<ul style="list-style-type: none"> 6/30/2021 	YES	11/30/2020