

APPENDIX TO HACN'S HCV ADMINISTRATIVE PLAN

POLICY CHANGES IN EFFECT DURING COVID-19 PANDEMIC

SUMMARY

This appendix is added to the Housing Authority of the City of Napa (HACN) Housing Choice Voucher Program Administrative Plan to incorporate temporary changes to the program's administration and operation during the COVID-19 pandemic.

On March 27, 2020, the Coronavirus Aid, Relief and Economic Security (CARES) Act (Public Law 116-136) was signed into law and included special provisions for federally assisted housing programs, including the Housing Choice Voucher (HCV) programs. On April 10, 2020, the U.S. Department of Housing and Urban Development (HUD) issued a compilation of waivers under the authority of the CARES Act that allows housing authorities to make policy changes to administration and operation of their HCV program.

These temporary changes shall be effective until the expiration of the applicable HUD COVID-19 waivers except as otherwise noted. The following are the temporary changes made to the HACN's HCV program based on the HUD waivers elected:

U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT (HUD) WAIVERS/POLICY CHANGES

The following waivers provided in PIH Notice 2020-33 Rev-2 will be utilized by HACN to amend relevant policy sections as noted in this appendix to the Administrative Plan.

The temporary policies described below temporarily replace the policies and procedures in the Administrative Plan. Unless otherwise stated in the applicable waiver, these policies remain in effect until the expiration of the applicable HUD COVID-19 waivers.

1. PH & HCV 1 - 5 Year & Annual Plan Submission Dates: Significant Amendment Requirements:

HUD has waived the procedural requirements that typically apply to significant amendments or modifications to the Annual Plan and establishes an alternative requirement that allows PHAs to implement significant amendments or modifications to the Annual Plan without first having such changes approved by the HACN Board.

Policy Change: HACN shall post changes to its Annual Plan on its webpage and notify participants and/or landlords of changes impacting them through alternate means. The HACN may administratively adopt these changes and subsequently obtain Board approval.

2. PH & HCV-2 - Family Income & Composition Delayed Annual Recertifications (Admin Plan Chapter 17, Page 66)

HUD allows PHAs to temporarily waive the requirement to conduct a reexamination of family income and composition at least annually.

Policy Change:

Upon request by program participants, HACN shall approve delays of annual reexaminations of income and household composition. All Calendar Year 2020 reexaminations must be completed by December 31, 2020 and reexaminations due from January 1, 2021 through June 30, 2021 must be completed by June 30, 2021 unless the allowable waiver period is extended by HUD.

3. PH & HCV-3 - Annual Reexamination of Income Verification Requirements (Admin Plan, Chapter 11, Page 43)

HUD has waived the requirement that PHAs use the income hierarchy described by PIH Notice 2018-18 and will allow PHAs to forgo third-party income verifications for annual reexaminations, including the use of EIV, if a PHA opts to conduct annual recertifications rather than delaying them. PHAs may consider self-certification as the highest form of income verification to process annual reexaminations. This may occur over the telephone (but must be documented for the written record by PHA staff), through an e-mail or postal mail with a self-certification form sent by the tenant or through other electronic communication. Income and family composition examinations and recertifications do not have to be conducted in person.

Policy Change:

The HUD Hierarchy and Techniques shall be suspended during the HUD waiver period. HACN shall consider written and verbal self-declarations submitted by household adults as the primary verification of income and process reexaminations based on the self-certifications. Where available, third party verifications will be accepted to augment or support the self-certification. The family shall be responsible to repay any overpayment of housing assistance that may result if material income discrepancies are later discovered.

4. PH & HCV-4 - Interim Reexaminations (Admin Plan, Chapter 17, Page 66)

HUD has waived the requirement to use the income hierarchy described by PIH Notice 2018-18 and will allow PHAs to forgo third-party income verifications for annual reexaminations, including the use of EIV, if a PHA opts to conduct annual recertifications rather than delaying them. PHAs may consider self-certification as the highest form of income verification to process annual reexaminations. This may occur

ATTACHMENT 2

over the telephone (but must be documented for the written record by PHA staff), through an e-mail or postal mail with a self-certification form sent by the tenant or through other electronic communication. Income and family composition examinations and recertifications do not have to be conducted in person.

Policy Change:

The HUD Hierarchy and Techniques shall be suspended during the HUD waiver period. HACN shall consider written and verbal self-declaration submitted by household adults as the primary verification of income and process reexaminations based on the self-certifications. Where available, third party verifications will be accepted to augment or support the self-certification. The family shall be responsible to repay overpayment of housing assistance that may result if material income discrepancies are later discovered.

5. PH & HCV-7 Waiting List (Admin Plan, Chapter 3, Page 14)

HUD has waived public notice requirements for opening and closing the waiting list during the waiver period and allows the PHA to notify the public through alternative methods.

Policy Change:

When opening and closing a waiting list during the HUD-waiver period, HACN shall notify the public by using alternative methods that may include posting notifications on the HACN website, conducting outreach to community partners and landlords/property managers, and advertising through social media.

6. HQS-5 Biennial Inspections (Admin Plan, Chapter 15, Page 62)

HUD has waived the requirement that the PHA inspect units not less than biennially. All delayed biennial inspections must be completed as soon as reasonably possible, but no later than December 31, 2021. Beginning on November 30, 2021, the owner of any unit with a delayed inspection must provide a written certification that the owner has no reasonable basis to have knowledge of life-threatening conditions in the unit.

Policy Change:

HACN shall continue to conduct inspections unless the family or owner request a delay. Effective November 30, 2021, the owner of any unit with a delayed inspection must submit a written certification that the owner has no knowledge of any life-threatening conditions in the unit as a condition of the inspection being delayed.

7. HQS Quality Control Inspections (Admin Plan, Chapter 1, Page 9):

ATTACHMENT 2

HUD has waived its supervisory quality control inspections during the waiver period.

Policy Change:

HACN will not conduct quality control inspections of completed inspections. HACN will resume quality control inspections in July 2021 or on such alternate date as determined by HUD.

8. HCV-1 Administrative Plan (Admin Plan, Chapter 1, Page 7)

HUD has waived the requirement that a PHA's administrative plan be formally adopted by a PHA board for amendments. The plan must be formally adopted as practicable but no later than June 30, 2021.

Policy Change:

HACN will update the Administrative Plan as needed and required by HUD where permitted without Board approval and will bring all changes implemented to the Board by the HUD determined deadline. HACN will post changes to its Admin Plan to its website.

9. HCV-2 PHA Oral Briefing (Admin Plan, Chapter 6, Page 28)

HUD has waived the requirement that the PHA must give an oral briefing to families and allows for other means of providing the briefing, such as webcast, video call, expanded information packet, etc. The PHA must ensure that the method of communication is effective including for those with vision, hearing, and other communication-related disabilities and those persons with limited English proficiency.

Policy Change:

HACN shall send briefing packets via e-mail or regular mail to participants prior to the briefing. HACN shall conduct briefings with new participants and households moving to other units by having them watch a briefing video on the internet or through another electronic means with follow-up by telephone or other electronic means. This is available in English and in Spanish. If another language is preferred, HACN shall utilize its language line to provide interpretation services. If a household is unable to conduct the briefing through these other methods, HACN shall schedule a socially distanced in-person briefing.

10. HCV-3 Term of Voucher - Extension of Term (Chapter 6, Page 29)

HUD has waived the requirement that the voucher term extension be in accordance with the PHA administrative plan.

Policy Change:

For the period beginning March 27, 2020, the date of the initial declaration of federal disaster, through December 31, 2020, HACN paused the voucher term for all families. Effective January 1, 2021, HACN will revert back to the voucher terms of 120 days, with a 60-day extension, for a total of 180 days as per the Administrative Plan. All impacted voucher holders shall be notified of this policy change and the applicable term of their voucher.

11. HCV-7 Increase in Payment Standard During HAP Contract Term

HUD has waived the requirement that if a payment standard is increased during the term of a HAP contract, the increased payment standard shall not be effective until the household's first regular reexamination. Instead, the increased payment standard may be effective at any time (e.g. interim reexaminations, owner rent increase) after the effective date as long as it is not later than the family's first regular reexamination.

Policy Change:

HACN shall increase the payment standard for the family at any time after the effective date of the increase in payment standard if the family's annual reexamination is delayed.

12. SEMAP

HUD allows PHAs to retain their prior year's SEMAP score unless the PHA requests otherwise.

Policy Change:

HACN has opted to retain its SEMAP score for the program year ending June 30, 2019 for the program year ending June 30, 2020. In accordance with HUD waiver requirements, SEMAP scoring will resume for the program year ending June 30, 2021.