

The HACN will allow Napa County or its partnering homeless service agency to verify the individual or family meets the preference qualification, and Napa County or its partnering homeless service agency will verify the preference qualification before the individual or family is referred to the HACN.

#### 11. Non-Elderly Persons with Disabilities who are Homeless or at Risk of Homelessness Limited Preference

The HACN administers a limited preference of fifteen (15) Housing Choice Vouchers for non-elderly person with disabilities who are homeless or at risk of becoming homeless. This preference applies to any household that includes one or more non-elderly person with disabilities and is homeless or at risk of becoming homeless as defined in the 2017 Mainstream program definitions.

#### ~~12. Limited Preference for Pandemic~~

~~Within 12 months of the declaration of a federally declared disaster due to a pandemic, HACN shall give an additional preference of 25 points to those applicants who have experienced a documented decrease in total household income of at least 30% because of the pandemic; This limited preference shall apply to up to 100 Housing Choice Vouchers.~~

### **E. INCOME TARGETING [24 CFR 982.201(2)]**

1. In accordance with the Quality Housing and Work Responsibility Act of 1998, each fiscal year the HACN will reserve a minimum of seventy-five percent (75%) of its Section 8 new admissions for extremely low-income families, whose income does not exceed thirty percent (30%) of the area median income. The HACN will admit families who qualify under the extremely low-income limit to meet the income targeting requirement, regardless of preference. The annual income (gross income) of a participant family is used for determination of income- eligibility.

2. If the family's verified annual income, at final eligibility determination, does not fall under the extremely low-income limit and the family was selected for income targeting purposes before families with a higher preference, the family will be returned to the waiting list with their original date and time.

3. The HACN's income targeting requirement does not apply to low-income families continuously assisted as provided for under the 1937 Housing Act and low-income or moderate-income families entitled to preservation assistance under the tenant-based program as a result of a mortgage prepayment or opt-out.

### **F. TARGETED FUNDING [24 CFR 982.203]**

When HUD awards special funding for certain family types, families who qualify are not placed on the regular waiting list. Applicants who are admitted under targeted funding which are not identified as Special Admission applicants are identified by codes in the

The HACN administers ~~thirty (30)~~sixty (60) Mainstream vouchers for qualifying disabled participants and ~~eleven (11)~~fifteen (15) Mainstream vouchers for households that are homeless or at-risk of homelessness that include a disabled household member who is under 62 years of age. Community agencies provide ongoing case management as needed. Mainstream vouchers shall be issued to eligible households through the HACN's waiting list. The County's partner homeless service agency shall verify each household qualifies as homeless or at-risk of homelessness for the HACN.

If HACN has exhausted its waiting list of Mainstream eligible households, HACN may opt to do a limited opening of its waiting list for referrals from the County's Continuum of Care's Coordinated Entry System for Mainstream vouchers.

#### 4. Non-Elderly Disabled (NED) Vouchers

HACN has special purpose vouchers for Non-Elderly Disabled (NED) families. If HACN has exhausted its waiting list of NED eligible households, HACN may opt to do a limited opening of its waiting list for referrals from the County's Continuum of Care's Coordinated Entry System for NED vouchers.

### **G. REMOVAL FROM WAITING LIST [24 CFR 982.204(C)]**

1. The HACN waiting list may be purged not more than one time each year by a mailing to all applicants or, at the HACN'S option, to all applicants who have been on the waiting list more than three years, to ensure that the waiting list is current and accurate. The mailing will request confirmation of continued interest. Mailings to the applicant that require a response will state that failure to respond within thirty (30) days from the date of the letter will result in the applicant's name being dropped from the waiting list.

If the applicant fails to respond within (30) thirty calendar days, a second notice will be sent to the applicant allowing a grace period of (30) additional days. Any applicant who responds during this grace period will be reinstated on the waiting list to their original date and time of application. Failure to respond to the second notice will result in an applicant's name being removed from the waiting list.

2. The decision to withdraw an applicant family that includes a person with disabilities from the waiting list is subject to reasonable accommodation. If the applicant did not respond to the HACN request for information or updates because of a claim of a family member's disability, the HACN may reinstate the applicant in the family's former position on the waiting list when written documentation is provided verifying the claim.

3. If a letter is returned to the HACN by the Post Office without a forwarding address, the applicant will be removed without further notice and the envelope and letter will be maintained in the applicant's file.

4. If an applicant is removed from the waiting list for failure to respond, the HACN may reinstate the applicant if the HACN determines the lack of response was due to HACN error, or to circumstances beyond the applicant's control.

## 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:

#### Limited Preference for Pandemic

HACN adopted a limited preference as follows: within 12 months of the declaration of a federally declared disaster due to a pandemic, HACN shall give an additional preference of 25 points to those applicants who have experienced a documented decrease in total household income of at least 30% because of the pandemic; This limited preference applied to up to 100 Housing Choice Vouchers. This preference was in place from March 27, 2020 through March 26, 2021 when the preference during the COVID-19 pandemic terminated and is no longer an active preference.

### 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.

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-6 Family Self Sufficiency Contract of Participation Extensions (Admin Plan, Appendix VIII, Section J.3., Page 131)

HUD has added circumstances surrounding COVID as “good cause” for the PHA to approve extensions for Family Self Sufficiency Contracts of Participation

Policy Change:

HACN shall consider circumstances surrounding COVID as “good cause” for extending a Family Self Sufficiency Contract for a period next to exceed two-years.

6. 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.

67. 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.

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

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