

**Temporary Amendments to the Low Rent Public Housing Program Administrative Plan and
the Housing Choice Voucher Program Administrative Plan**

Coronavirus Aid, Relief and Economic Security Act

In accordance with the Coronavirus Aid, Relief and Economic Security (CARES) Act, the US Department of Housing and Urban Development (HUD) has established temporary waivers and alternative processes for certain regulatory and statutory requirements of the Low Rent Public Housing (LRPH) Program and the Housing Choice Voucher (HCV) Programs. The implementation of these waivers is at the discretion of the Lowell Housing Authority (LHA).

During this health emergency, the LHA is making every attempt to maintain the safety of our residents, property owners and dedicated staff. The LHA has adopted the following amendments to our Administrative Plans in order to ensure safe program operation, while maintaining program integrity to the fullest extent possible. The following changes have been adopted by the LHA:

**AMENDMENTS TO THE LOW RENT PUBLIC HOUSING (LRPH) ADMINISTRATIVE PLAN AND
THE HOUSING CHOICE VOUCHER (HCV) ADMINISTRATIVE PLAN**

FAMILY INCOME AND COMPOSITION: ANNUAL INCOME

LRPH Administrative Plan – Chapter 11, Sections A,B,C,D,E

HCV Administrative Plan – Chapter 11, Section A,B,C,D,E

Temporary amendment will expire on December 31, 2020 or at a time determined by HUD through waiver extension.

The LHA is required to reexamine each family's income and composition annually. During this health emergency, the LHA will work remotely with families to conduct annual recertifications of income and family composition. To do this, a process has been implemented to mail recertification documents requiring signatures to families, conduct telephone interviews, and request documentation, if available, to be provided via electronic methods or through the US Postal Service. A stamped, addressed envelope is included in the packet to ensure that documents requiring signatures and supporting documentation will be mailed back to the LHA.

In the event that the LHA is unable to process an annual recertification of family income and composition, tenant rent will be based on the most recent certification on file. The LHA will conduct a recertification of family income at the earliest possible date prior to December 31, 2020. For families participating in the Housing Choice Voucher Program, an increased Payment Standard will be applied to determine tenant rent, effective on the date of the annual recertification.

FAMILY INCOME AND COMPOSITION: ANNUAL REEXAMINATION OF FAMILY INCOME – VERIFICATION REQUIREMENTS

LRPH Administrative Plan – Chapter 7, Section A,B,C,D,E

HCV Administrative Plan – Chapter 7, Section A,B,C,D,E

Temporary amendment will expire on July 31, 2020, or at a time determined by HUD through waiver extension.

The LHA is required to verify all information that is used to establish tenant rent and is also required to obtain a family's consent to collect the information. During this health emergency, at the time of the annual recertification of income, the LHA will request verification of the most recent income and family composition information that is readily available to the family. Electronically transmitted photos of income and family composition documentation will be accepted. Documentation may also be sent through the US Postal Service. If documentation is not readily available, and income or family composition information cannot be verified through third party methods, the LHA will accept a family members self-certification verbally (documented by LHA staff) or through electronic communications.

LHA staff will continue to utilize Enterprise Income Verification (EIV) information as a means of verification, to the fullest extent possible. The LHA will monitor EIV information going forward, and any discrepancies identified will be addressed through enforcement procedures described in the Administrative Plan.

FAMILY INCOME AND COMPOSITION: INTERIM CERTIFICATION OF INCOME

LRPH Administrative Plan – Chapter 11, Section F,G

HCV Administrative Plan – Chapter 11, Section F,G

Temporary amendment will expire on July 31, 2020, or at a time determined by HUD through waiver extension.

Interim certifications are completed when a family has a change in income or composition. At the time a family requests an interim certification of income, the LHA will request verification of the change. The LHA will make every attempt to complete an interim determination of rent within a reasonable time period. The LHA will request income and family composition information that is readily available to the family. Electronically transmitted photos of income and family composition information will be accepted. Documentation may also be sent through the US Postal Service. If documentation is not readily available, and income or family composition information cannot be verified through third party methods, the LHA will accept a family member's self-certification verbally (documented by LHA staff) or through electronic communications.

LHA staff will continue to utilize and Enterprise Income Verification (EIV) information as a means of verification, to the fullest extent possible. The LHA will monitor EIV information going forward and any discrepancies identified will be addressed through enforcement procedures described in the Administrative Plan.

AMENDMENTS TO THE HOUSING CHOICE VOUCHER (HCV) PROGRAM ADMINISTRATIVE PLAN

HOUSING QUALITY STANDARDS (HQS) - INITIAL INSPECTIONS

HCV Administrative Plan – Chapter 8, Section A, G

Temporary amendment will expire on July 31, 2020, or October 31, 2020, as described below. This amendment may be extended to a time determined by HUD through waiver extension.

HUD requires that all units occupied by families receiving Housing Choice Voucher Program assistance meet Housing Quality Standard (HQS). The LHA is committed to ensuring the safety of our families who have submitted a Request for Tenancy Approval to lease a unit. During this health emergency, the LHA will make every attempt to conduct initial inspections of apartments. To do this, the LHA will inspect vacant units utilizing safety protocols of social distancing and the use of protective equipment. Upon inspection, property owners will be asked to provide unit access to our inspector, but remain outside the unit until the inspection is completed.

During this time, initial inspections of occupied units may not be possible or advisable. In extreme cases, the LHA will accept a property owner's certification that he/she has no reasonable basis to have knowledge that life threatening conditions exist in the unit. As determined by HUD, property owner certifications will only be accepted through July 31, 2020 (or at a time determined by HUD through waiver extension). In this case, an initial inspection will be conducted by the LHA on the soonest possible date prior to October 31, 2020 (or at a time determined by HUD through waiver extension).

The LHA retains the right to conduct an HQS inspection on any assisted unit, at any time. Additionally, the LHA may conduct an initial inspection on a unit if such inspection is determined to be warranted by the LHA.

The process described above will cover initial inspections for the HCV Project Based Program, including Project Based turn-over inspections or inspections to add or substitute units under the Project Based Program.

HOUSING QUALITY STANDARDS (HQS) – BIENNIAL INSPECTIONS

HCV Administrative Plan – Chapter 8, Section I

Temporary amendment will expire on October 31, 2020, or at a time determined by HUD through waiver extension.

The LHA is required to conduct inspections of units under contract no later than 24 months from the date of the most recent inspection. During this health emergency the LHA will delay biennial inspections for both tenant-based and project-based units. All delayed inspections will be completed as soon as reasonably possible on or before October 31, 2020, or at a time determined by HUD through waiver extension.

HOUSING QUALITY STANDARDS (HQS) – INTERIM INSPECTIONS –SPECIAL INSPECTIONS

HCV Administrative Plan – Chapter 8, Section J,L

Temporary amendment will expire on July 31, 2020, or at a time determined by HUD through waiver extension.

Upon notification to the LHA by a family or government official of a life-threatening condition in an assisted unit, the LHA will immediately notify the property owner. The property owner will be required to correct the life-threatening deficiency within 24 hours of the LHA notification. The property owner MUST provide documentation of the correction through a text or email, including a photo and written verification that the deficiency has been corrected. In the case of a non-life threatening deficiency, the LHA will notify the property owner in writing and require that correction be made within 30 days. A property owner's failure to comply will result in further action as described in the Administrative Plan which may include suspension of subsidy and/or termination of the Housing Assistance Payments Contract.

HOUSING QUALITY STANDARDS (HQS) – QUALITY CONTROL INSPECTIONS

HCV Administrative Plan – Chapter 8, Section K

Temporary amendment will expire on October 31, 2020, or at a time determined by HUD through waiver extension.

HUD requires an LHA supervisor or other qualified person to conduct quality control inspections of sample units annually. During this health emergency, the LHA will suspend HQS supervisory inspections.

HOUSING QUALITY STANDARDS – SPACE AND SECURITY – DETERMINING FAMILY UNIT SIZE

HCV Administrative Plan – Chapter 5, Section C

Temporary amendment will expire on April 10, 2021, or at a time determined by HUD through waiver extension.

There are minimum space requirements (occupancy standards) established to determine the appropriate number of bedrooms for each family participating in the HCV Program and the HCV Project Based Program. With the addition of a family member into an assisted unit, the unit might not meet the space and security standards. During this health emergency, the LHA will waive these requirements and tenants with family composition changes will be allowed to remain in the unit until the end of the lease term or April 10, 2021, whichever is longer. Families will not be allowed to extend leases or enter into new leases for units where the space and security standards are not met.

HOUSING QUALITY STANDARDS (HQS)–INITIAL INSPECTIONS FOR HOMEOWNERSHIP

Temporary amendment will expire on July 31, 2020, or at a time determined by HUD through waiver extension.

HCV Administrative Plan – Appendix C – Homeownership Program

Two pre-purchase inspections are required in order for a home to be considered for assistance. The LHA must conduct an initial HQS inspection and an inspection must be performed by an independent professional home inspector. During this health emergency, initial HQS inspections for homeownership will not be conducted. The LHA will accept the report of an independent professional home inspector and will review the information provided. The LHA reserves the right to disapprove a unit for assistance under the homeownership program if the information provided shows that the home is not compliant with Housing Quality Standards.

HOUSING CHOICE VOUCHER PROGRAM – HCV ORAL BRIEFING

HCV Administrative Plan – Chapter 5, Section A

Temporary amendment will expire on July 31, 2020, or at a time determined by HUD through waiver extension.

During this health emergency, the LHA will conduct HCV Briefings through webcast or video call. Briefings will be conducted in English, Spanish and Khmer, as needed. Briefing packets, with required documentation, will be mailed to families in advance of the webcast or video call. Special accommodations will be made for those who are vision or hearing impaired.

HOUSING CHOICE VOUCHER PROGRAM – VOUCHER TERM, EXTENSIONS, AND SUSPENSIONS

HCV Administrative Plan – Chapter 5, Section F

Temporary amendment will expire on July 31, 2020, or at a time determined by HUD through waiver extension.

The maximum term for a Voucher holder in housing search is a period of up to 120 days. During this health emergency, the LHA will consider extensions beyond this term to ensure that families in need of rental assistance are housed. The Division Director of Leased Housing Programs will make determinations on extensions beyond the 120 term based on individual situations. Families will be required to communicate housing search status to the Division Director of Leased Housing Programs during the 120 day time period.

HOUSING CHOICE VOUCHER PROGRAM – ABSENCE FROM UNIT – MANDATORY POLICIES AND OTHER AUTHORIZED TERMINATIONS

HCV Administrative Plan – Chapter 12, Section D

Temporary amendment will expire on December 31, 2020, or at a time determined by HUD through waiver extension.

Families living in units under a Housing Assistance Payments (HAP) Contract may not be absent from the unit for more than 180 days. During this health emergency, the LHA may continue HAP payments and not terminate HAP contracts due to extenuating circumstances including hospitalization, inability to travel due to restrictions, or other reasons. A final determination to continue HAP payments will be made by the Division Director of Leased Housing Programs after consultation with the family.

HOUSING CHOICE VOUCHER PROGRAM – AUTOMATIC TERMINATION OF HOUSING ASSISTANCE PAYMENTS CONTRACT – FAMILY NO LONGER REQUIRES ASSISTANCE

HCV Administrative Plan – Chapter 12, Section A

Temporary amendment will expire on December 31, 2020, or at a time determined by HUD through waiver extension.

When a family's income increases and a determination is made that 30% of adjusted income exceeds the Payment Standard for the leased unit, and the Housing Assistance Payment is \$0, the family is placed in a suspension period for 180 days. During the suspension period, families who have a reduction in income will continue to receive rental assistance. Those that do not have a reduction in income will be subject to a termination of the Housing Assistance Payments Contract at the end of the 180 day suspension period. During this health emergency, the LHA may consider an extension beyond the 180 day suspension period. Extension requests may be authorized by the Division Director of Leased Housing Programs after careful review of a family's situation. Extensions will not be granted beyond December 31, 2020.

HOUSING CHOICE VOUCHER PROGRAM – INCREASE IN PAYMENT STANDARD UNDER HAP CONTRACT TERM – CHANGES IN PAYMENT STANDARDS AND UTILITY ALLOWANCE

HCV Administrative Plan – Chapter 11, Section H

Temporary amendment will expire on December 31, 2020, or at a time determined by HUD through waiver extension.

Increased Payment Standards are applied to calculate tenant rent at the time of the regular recertification of family income. During this health emergency, the LHA may apply an increased Payment Standard at the time of interim certification of income, or at the time an owner requests a rent increase. In cases where an annual reexamination of family income has been delayed, the LHA will apply the increased Payment Standard amount to calculate tenant rent on the date that the family's regular examination of income would have been effective, in the absence of the waiver. All participants

will receive the increased Payment Standard no later than the effective date of the family's first regular reexamination of income following the increased Payment Standard.

HOUSING CHOICE VOUCHER PROGRAM – UTILITY ALLOWANCE SCHEDULE REVIEW AND REVISION – CHANGES IN PAYMENT STANDARDS AND UTILITY ALLOWANCE

HCV Administrative Plan – Chapter 11, Section H

Temporary amendment will expire on December 31, 2020, or at a time determined by HUD through waiver extension.

The utility allowance schedule for the LHA is reviewed and revised annually. During this health emergency, the LHA may delay this revision. The utility allowance schedule will be revised at the soonest possible time before December 31, 2020.

LOW RENT PUBLIC HOUSING ADMINISTRATIVE PLAN AMENDMENTS

PUBLIC HOUSING PROGRAM – COMMUNITY SERVICE AND SELF-SUFFICIENCY REQUIREMENT

LRPH Administrative Plan - Community Service Policy – Appendix E

Temporary amendment will expire on March 31, 2021, or at a time determined by HUD through waiver extension.

Each adult resident living in public housing, except for those family members that are exempt, must perform 8 hours of community service per month, participate in an economic self-sufficiency program or a combination of both. During this health emergency, the LHA will suspend this requirement until the family's next reexamination of income and family composition. After the annual reexamination of the family, the Community Service and Self-Sufficiency requirement will become effective again for non-exempt family members.

PUBLIC HOUSING PROGRAM – OVER-INCOME FAMILIES

LRPH Administrative Plan – Over-Income Policy – Appendix P

Temporary amendment will expire on December 31, 2020, or at a time determined by HUD through waiver extension.

Under the current policy, families whose income exceeds the program maximum income level for two consecutive years are required to be terminated or be charged an alternative rent amount. During this health emergency, the LHA will permit over income families to remain in their units and pay the same rental amount until the LHA conducts the next annual recertification of family income.

FAMILY SELF SUFFICIENCY PROGRAM ACTION PLAN AMENDMENT

FAMILY SELF SUFFICIENCY PROGRAM – CONTRACT EXTENSION

Temporary amendment will expire on December 31, 2020, or at a time determined by HUD through waiver extension.

The Family Self Sufficiency program allows for the extension of an FSS contract of participation for a two year period for good cause. During this health emergency, program participants may extend their contracts using COVID-19 as good cause for a period not to extend beyond December 31, 2020.