

## APPENDIX I: OPERATIONS DURING THE COVID-19 STATE OF EMERGENCY

### 1) Background and Authorization

The policies described in this appendix may only be activated during the COVID-19 State of Emergency.

HUD approved an MTW Technical Amendment on March 27, 2020 authorizing SHA to implement certain efficiencies during the COVID-19 State of Emergency.

SHA adopted HCV-1 of PIH2020-05, allowing the administrative plan to be revised on a temporary basis without Board approval. The Seattle Housing Authority Board of Directors was briefed initially on 4/13/20 regarding COVID-19 related HUD waivers and policy/procedure changes.

End date: these modifications are authorized through the end 2020, normal practices will be resumed as early as is reasonable.

### 2) Verification

The Verification procedures in Chapter 9(A) are modified. All forms of income verification will be considered equivalent beginning with all reviews effective on or after April 1, 2020. SHA may use electronic systems (i.e. WorkNumber, ESD, DCS, EIV and DSHS etc.) to verify self-certified income without any further verification, or, if electronic systems are unable to substantiate the claimed income, SHA may process the application or certification based solely on the household self-certification (which may be taken verbally).

### 3) Annual and Triennial Reexaminations

MTW authorization: all regular annual and triennial certifications scheduled to occur during the state of emergency may be deferred until the next regularly scheduled certification. Triennials certifications that are scheduled for full review must still submit a release of information form.

Chapter 14(A) is temporarily modified. All regularly scheduled Reviews effective 7/1/20 through 4/1/21 will be deferred until their next regularly scheduled review.

Annual Reviews for Participants in the Mod Rehab program will be processed as normal.

### 4) Reporting Interim Changes

#### a) Timely Reporting of Changes in Income and Household Circumstances

For the duration of the emergency, requirements for timely reporting as described in Chapter 14(G) are modified. Any reported income decrease will become effective the first of the next month so long as it was reported by the end of the month. It is not necessary to provide proof that the reduction will last more than 30 days. Income may be reported through the Self Certification form or verbally, and verification from the employer is not required.

Any court-ordered child support that is reported stopped may be processed by self-certification and the 90 day waiting period waived.

#### b) Increases in Income

The interim Re-Examination policy described in Chapter 14(G) is temporarily modified. Interim increases in earned income reported will not be processed if the increase is from the same employer, including self-employment (e.g. overtime, wage increase, or an increase in the number of hours worked within

the same employer) and is anticipated to be less than \$1,000 per month. Implementation Dates: Interim income increases reported 4/6/2020 – 10/31/2020 (may be extended on a month by month basis).

#### c) Unemployment Insurance Income (UI)

Regular unemployment benefits are considered income. HCV shall exclude the \$600 per week enhancement provided by the CARES Act because these payments are temporary and likely nonrecurring after the pandemic emergency ends (HUD COVID-19 FAQs Version 3).

#### d) Hold Harmless Policy for un/under-reported Income

If a participant failed to report, or under-reported, an increase in income during the period these modifications are in place, they will not be required to pay back rent/HAP if the annualized amount of income not captured is less than \$12,000 (or \$1,000 per month); this is equivalent to \$300 per month back payment.

SHA may extend additional protections for residents and participants to align with Proclamations issued by the Governor of the State of Washington, or with Federal Guidance during the State of Emergency

#### e) Hardship Policy

Households who experienced an income disruption but failed to report it may have access to a retroactive rent decrease. The ability is granted by PIH Notice 2020-13, REV-1 to expedite changes to interim reexam policies in the Admin Plan and ACOP to make the effective date of an interim reexam retroactive in the event of extenuating circumstances.

#### 5) Contract Rent Increases

Contract Rent Increase requests from Tenant Based landlords are temporarily suspended through at least November 30th, 2020. Rent increase requests in process as of 4/15/2020 or submitted thereafter are subject to this suspension. After the suspension is lifted, all rent increase requests submitted will be processed retroactive to the effective date indicated on the request. An email was sent to all landlords on 4/15/20.

#### 6) Temporary Freeze on TTP Increases

On April 16, the governor issued an order which prohibits rent increases until June 4, 2020. SHA has chosen to recognize the impact of the coronavirus crisis on tenants' lives and the spirit of the governor's order. Therefore, during the period of this state-wide "rent freeze," Interim Reviews that result in an increase in the TTP will be processed with an effective date no earlier than July 1, 2020. This prohibition was extended through October 31, 2020. |

Any Interim resulting in an increased TTP that was processed on or after April 16, 2020, with an effective date prior to November 1, 2020, and those with an effective date of 6/1 regardless when they were keyed, will be adjusted to reflect a November 1 effective date.

#### 7) Unit Inspections

##### a) Annual and Biennial HQS Inspection

Annual and biennial HQS inspections as described in Chapter 12(D) are deferred through the end of July 2020.

#### b) Initial HQS Inspection

Effective Friday, March 20, 2020, initial inspections as required under Chapter 12(C) are postponed. For the duration of the state of emergency a landlord self-certification process will be used to verify HQS Compliance and approve new move-ins.

#### c) HQS Space and Security

PIH2020-05 HQS-10 : HCV is waiving the requirement that a unit have at least 1 bedroom or living/sleeping room for each 2 persons where a current participant needs to add a member or members to the assisted household as a result of the COVID-19 emergency, and the additional family members would result in the unit not meeting the space and security standards. This provision does not apply to an initial or new lease.

#### d) Newly Constructed Project-Based Units

PIH2020-05 HQS-2: For rehabilitated and newly constructed units, HCV may waive the HQS inspection requirement under § 983.156(a)(1). HCV may rely on the owner's certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist in the unit or units in question. At minimum, the PHA must require the owner's certification. HCV is required to conduct an HQS inspection on the unit as soon as reasonably possible but no later than October 31, 2020.

#### e) Quality Control Inspections

PIH 2020-05 HQS-9: HQS Quality Control inspections as described in Chapter 12(G) may be waived beginning in April 2020 through December, 31 2020.

### 8) Admissions

#### a) Eligibility for Admission

Applicants that are unable to provide proper documentation of eligibility or income as described in Chapter 2 of this Plan will be permitted to be issued a vouchers and lease in a unit during the state of emergency. Applicants will be provided with a copy of all documentation that will be required once the state of emergency is over.

#### b) FUP Eligibility and Referrals

PIH2020-05 HCV-10: HCV may execute a HAP contract on behalf of any otherwise eligible FUP youth not more than 25 years of age (not yet reached their 26th birthday).

PIH2020-13 HCV-12: 42 U.S.C. 1437f(x)(2) provides that assistance may be provided on behalf of "otherwise eligible youths... who have left foster care or will leave foster care within 90 days." Due to the COVID-19 pandemic, it may be difficult for youth to find units that are available for lease within the 90-day timeframe, increasing the risk that such youth may experience homelessness. To prevent such an outcome, HUD is waiving the statutory limitation and establishing an alternative requirement. Specifically, PHAs may accept referrals from child welfare agencies for youth who will leave foster care within 120 days. This waiver is available through December 31, 2020.

#### c) Voucher Issuance

PIH2020-05 HCV-2: The oral briefing requirement as described in Chapter 10(A) is waived. Instead, a combination of video and phone briefings will be used. All new admissions and MWCA vouchers will be issued remotely.

#### d) Term of Voucher

The expiration of vouchers under Chapter 10(C) has been temporarily suspended. . All active vouchers as of 3/13/20 will not be expired through 8/31/2020. This date may be further extended if needed. Income verification will be considered current beyond 180 days in alignment with this change.

#### e) Contract Execution Process

PIH2020-05 HCV-4: SHA may execute a HAP contract after the normally required 60 day deadline. As described in Chapter 11(J), SHA will make its best efforts to obtain HAP Contracts for all participants entering into a lease. If there are extenuating circumstances that prevent the landlord from signing a HAP Contract, an extension may be provided.

#### 9) Termination of Assistance

Termination of Assistance for Current Participants as described in Chapter 17 are temporarily suspended except for abandoned units and deceased tenants. The program administrator may continue to pursue termination at their discretion for participants who fail to comply with family obligations.

#### a) \$50 or Less HAP for 180 Days

The process outlined in Chapter 17(G) is temporarily suspended. Families who have received an OverIncome Notice will temporarily continue to receive HAP until the emergency has passed.

#### b) Absence from Unit

PIH2020-05 HCV-5: HCV will use discretion in making decisions about terminating households that have been absent from the unit for more than 180 days due to COVID-19 emergency-related circumstances. HCV will allow absences from the unit up to 180-days for members unable to return from overseas due to COVID-19 travel restrictions, and longer if applicable with travel restrictions documented in the file.

#### c) FUP Term of Assistance

42 U.S.C. 1437f(x)(2) limits the availability of assistance to a period “not to exceed 36 months.” COVID19 may have resulted in job loss or the inability to identify a unit affordable to the youth without rental subsidy. As a result, the youth may again be at risk of homelessness at termination upon having received 36 months of assistance. To prevent such an outcome, HUD is waiving the statutory limitation and establishing an alternative requirement. Specifically, for FUP youth who will reach the 36-month limit between April 10, 2020, and December 31, 2020, a PHA may suspend terminations of assistance for a period of up to six months from the date the youth’s assistance would have been terminated absent this waiver. Depending on the timing and length of the suspension, impacted youth may have their assistance extended beyond December 31, 2020.

#### 10) Informal Hearings

Informal Hearings for terminations as described in Chapter 20 are delayed and will be rescheduled after the state of emergency is lifted. Participants who had requested an informal hearing as of 3/16/20 will continue to receive Housing Assistance Payments until their hearing date.

#### 11) Payment Agreements

Policies outlined in Chapter 19(A) have been temporarily suspended. The repayment term will be extended until after the state of emergency is lifted. No legal action will be taken at this time during the state of emergency to recoup payment.

## 12) Downsizing

If a family becomes over-housed as the result of a decrease in household size, such that it no longer meets the minimum occupancy standards outlined in Chapter 7, SHA will suspend the reduction of the subsidy to the appropriate voucher size until the next annual review/update in 2021.