

Waiver flexibilities Kentucky Housing Corporation will use for its HCV Program


As the public housing authority for the Commonwealth of Kentucky, KHC plans to utilize a number of waiver flexibilities for its Housing Choice Voucher Program, as allowed by the [COVID-19 Statutory and Regulatory Waivers for the Public Housing, Housing Choice Voucher...\(PIH 2020-05\)](#) notice issued by Assistant Secretary R. Hunter Kurtz on April 10, 2020 and further updated with Notice [PIH N2020-13](#) on July 2, 2020.

Attached is a list of the statutory and regulatory waivers KHC will utilize.

Per Notice PIH 2020-05 and Notice PIH 2020-13:

1. "The use of these waivers is at the discretion of the individual PHA," and, a "PHA does not need to notify HUD or receive HUD approval to begin utilizing these waivers/alternative requirements."
2. "PHAs are required to keep written documentation that record which waivers the PHA applied to their programs(s) and the effective dates."
3. A "PHA may need to initially provide this notification by placing information on its website and as a voice-mail message and following up with more formal written notice..."

Waiver Usage Approved by the following PHA Contact:

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 In response to the COVID-19 emergency

July 2020

Item	Summary of Alternative Requirements	Availability Period Ends*	Did PHA Implement Waiver & Alternative?	Date of PHA Adoption
PH and HCV-1 PHA 5-Year and Annual Plan	<ul style="list-style-type: none"> Alternative dates for submission Changes to significant amendment process 	Based on FY 7/31/20	No	
PH and HCV-2 Family income and composition – delayed annual reexaminations	<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 	12/31/20	No	
PH and HCV-3 Annual reexamination Income Verification	<ul style="list-style-type: none"> Waives the requirements to use the income hierarchy, including the use of EIV, and will allow PHAs to consider self-certification as the highest form of income verification PHAs that implement this waiver will be responsible for addressing material income discrepancies that may arise later 	7/31/20; Extended to 12/31/20 per PIH Notice 2020-13	Yes	4/20/20
PH and HCV-4 Interim reexaminations	Waives the requirement to use the income verification requirements, including the use of EIV, for interim reexaminations	7/31/20; Extended to 12/31/20*	Yes	4/20/20
PH and HCV-5 EIV System Monitoring	Waives the mandatory EIV monitoring requirements.	7/31/20; Extended to 12/31/20*	Yes	4/20/20
PH and HCV-6 FSS Contract of Participation	Provides for extensions to FSS contract of participation	12/31/20	Yes	4/20/20
PH and HCV-7 Waiting List	Waives public notice requirements for opening and closing waiting list Requires alternative process	7/31/20; Extended to 12/31/20*	Yes	4/20/20
HQS-1 Initial inspection	<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 October 31, 2020. 	7/31/20; Extended to 12/31/20* 10/31/20; Extended to no later than the 1-year anniversary of the date of the owner's certification per PIH Notice 2020-13	Yes	4/10/20
HQS-2: PBV Pre-HAP Contract Inspections,	<ul style="list-style-type: none"> Changes inspection requirements, allowing for owner certification that there are no life-threatening deficiencies 	7/31/20; Extended to 12/31/20*	Yes	4/10/20

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PHA acceptance of completed units	<ul style="list-style-type: none"> Where self-certification was used, PHA must inspect the unit no later than October 31, 2020. 	10/31/20; Extended to no later than the 1-year anniversary of the date of the owner's certification per PIH Notice 2020-13		
HQS-3 Non-Life Threatening HQS - Initial Unit Approval	<ul style="list-style-type: none"> Allows for extension of up to 30 days for owner repairs of non-life-threatening conditions 	7/31/20; Extended to 12/31/20*	Yes	4/10/20
HQS-4 Initial HQS - Alternative Inspections	<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 than October 31, 2020. 	7/31/20; Extended to 12/31/20* 10/31/20; Extended to no later than the 1-year anniversary of the date of the owner's certification per PIH Notice 2020-13	Yes	4/10/20
HQS-5 Biennial Inspections	<ul style="list-style-type: none"> Allows for delay in biennial inspections All delayed biennial inspections must be completed as soon as reasonably possible but by no later than October 31, 2020. 	10/31/20; Extended to no later than the 1-year anniversary of the date of the owner's certification per PIH Notice 2020-13	Yes	4/10/20
HQS-6 Interim Inspections	<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 	7/31/20; Extended to 12/31/20*	Yes	4/10/20
HQS-7 PBV Turnover Inspections	<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 	7/31/20; Extended to 12/31/20* 10/31/20; Extended to no later than the 1-year anniversary of the date of the owner's certification per PIH Notice 2020-13	Yes	4/10/20

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HQS-8: PBV HAP Contract – HQS Inspections to Add or Substitute Units	<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 	7/31/20; Extended to 12/31/20* 10/31/20; Extended to no later than the 1-year anniversary of the date of the owner’s certification per PIH Notice 2020-13	Yes	4/10/20
HQS-9 HQS QC Inspections	Provides for a suspension of the requirement for QC sampling inspections	10/31/20; Extended to 12/31/20*	Yes	4/10/20
HQS--10 HQS Space and Security	Waives the requirement that each dwelling unit have at least 1 bedroom or living/sleeping room for each 2 persons.	1 year from lease term or date of notice, whichever is longer; updated per PIH Notice 2020-13	No	
HQS-11 Homeownership HQS	<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 	7/31/20; Extended to 12/31/20*	No	
HCV-1 Administrative Plan	Waives the requirement to adopt revisions to the admin plan	7/31/20; per PIH Notice 2020-13 PHA must informally adopt changes by 9/30/20 & revisions by 12/31/20	Yes	4/20/20
HCV-2 PHA Oral Briefing	<ul style="list-style-type: none"> Waives the requirement for an oral briefing Provides for alternative methods to conduct required voucher briefing 	7/31/20; Extended to 12/31/20*	No	
HCV-3 Term of Voucher - Extensions of Term	Allows PHAs to provide voucher extensions regardless of current PHA policy	7/31/20; Extended to 12/31/20*	Yes	4/20/20
HCV-4 PHA Approval of Assisted Tenancy	<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 	7/31/20; Extended to 12/31/20*	No	
HCV-5 Absence from unit	<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 	12/31/20	No	
HCV-6 Automatic Termination of the HAP Contract	Allows PHA to extend the period of time after the last HAP payment is made before the HAP contract terminates automatically.	12/31/20	Yes	4/20/20

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HCV-7 Increase in Payment Standard	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.	12/31/20	Yes	04/27/20
HCV-8 Utility Allowance Schedule	Provides for delay in updating utility allowance schedule	12/31/20	Yes	4/20/20
HCV-9 Homeownership Counseling	Waives the requirement for the family to obtain pre-assistance counseling	7/31/20; Extended to 12/31/20*	No	
HCV-10 FUP Eligible Age	Extends the eligible age from 24 to 25 (not yet 26)	12/31/20	Yes	4/20/20
HCV-11 FUP Length of Assistance**	Extends the length of assistance for youth who will reach the 36-month limit between April 10, 2020 and December 31, 2020 for six months.	12/31/20	No	
HCV-12 FUP Timeframe for Referral**	PHAs may accept referrals from child welfare agencies for youth who will leave foster care within 120 days instead of 90 days.	12/31/20	Yes	7/13/20
HCV-13 Homeownership Max Term of Assistance**	PHA may extend homeownership assistance for up to 1 additional year.	12/31/20	Yes	7/13/20
HCV-14 Removal of PBV Unit from Contract**	<ul style="list-style-type: none"> Extends the 180-day timeframe of zero housing assistance payments, but not beyond 12/31/20 HAP may resume if the family's income changes during the timeframe of the extension 	12/31/20	Yes	7/13/20
11b SEMAP	PHA to retain prior year SEMAP score unless requests otherwise	HUD will resume issuing new scores starting with PHAs with FYE dates of 3/31/21	Yes	4/20/20
11c Financial reporting	Allows for extensions of financial reporting deadlines	Varies by PHA FYE	No	
12a Form HUD 50058	<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 	12/31/20	Yes	4/20/20

* Indicates extended application of waiver/alternative to 12/31/20 per PIH Notice 2020-13.

** New waiver/alternative added per PIH Notice 2020-13.