

## **APPENDIX**

### **POLICY CHANGES IN EFFECT DURING COVID-19 PANDEMIC**

#### **A. Summary**

In response to current and ongoing threats to public safety caused by the novel Coronavirus (COVID-19), the San Antonio Housing Authority (SAHA) has taken several measures to protect the health and safety of residents pursuant to local, state and national recommendations. On March 13, 2020, the City of San Antonio and Bexar County issued the first in a series of Emergency Public Health Declarations, and SAHA implemented modified operations to ensure the well-being of all clients and staff. Additionally, the Coronavirus Aid, Relief and Economic Security (CARES) Act (Public Law 116-136) was signed into law on March 27, 2020 and included special provisions for federally-assisted housing 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 allow Public Housing Agencies (PHAs) to make policy changes detailing their modified operations, which are outlined in this appendix.

#### **B. U.S. Department of Housing and Urban Development (HUD) Waivers**

The following waivers provided in PIH Notice 2020-05 will be utilized by SAHA to amend relevant policy sections, as noted in this appendix or in either the Administrative Plan (Admin. Plan) or Admissions and Continued Occupancy Policy (ACOP).

- PH AND HCV-2: Family Income and Composition: Delayed Annual Examinations
- PH AND HCV-3: Family Income and Composition: Annual Examination - Income Verification Requirements [Public Housing only]
- PH AND HCV-4: Family Income and Composition: Interim Examinations [Public Housing only]
- PH AND HCV-5: Enterprise Income Verification (EIV) Monitoring
- HQS-1: Initial Inspection Requirements
- HQS-2: Project-Based Voucher (PBV) Pre-HAP Contract Inspections, PHA Acceptance of Completed Units
- HQS-6: HQS Interim Inspections
- HQS-7: PBV Turnover Unit Inspections
- HQS-9: HQS Quality Control Inspections
- HCV-2: Information When Family is Selected - PHA Oral Briefing
- PH-4: ACOP: Adoption of Tenant Selection Policies
- PH-5: Community Service and Self-Sufficiency Requirement (CSSR)
- PH-9: Review and Revision of Utility Allowances
- PH-10: Tenant Notifications for Changes to Project Rules and Regulation

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#### **C. CARES Act Provisions**

Under the federal CARES Act, SAHA is prohibited from issuing late fees and notices to vacate for nonpayment of rent between March 27, 2020 and July 24, 2020. During that time frame and in accordance with these provisions, SAHA's Public Housing program will not charge late fees or initiate evictions proceedings due to nonpayment of rent during that time, and landlords under SAHA's voucher programs are prohibited from charging late fees or initiating eviction proceedings due to nonpayment of rent.

#### **D. SAHA Policy Amendments**

The following policies amend the current policies and procedures under both the Administrative Plan and the ACOP. Unless otherwise stated in the applicable waiver, these policies remain in effect until the expiration of the COVID-19 emergency declaration.

##### **1. Requirements for Acceptable Documents [Admin. Plan Ch. 7; ACOP Ch. 7, Ch. 9; PIH 2020-05 PH AND HCV-3]**

- a. SAHA may accept scans or pictures of documents used for verification.
  - i. Images of documents must be legible and unaltered.
  - ii. SAHA may re-verify at any time by requiring submission of the original document.

##### **2. HUD's Verification Hierarchy [Admin. Plan 7.1; ACOP 7.1; PIH 2020-05 PH AND HCV-3, PH AND HCV-4 (Public Housing only)]**

- a. SAHA may skip steps (iii)-(v) of HUD's Verification Hierarchy: Written Third-Party Verification, Written Third-party Verification Form and Oral Third-party Verification. SAHA will still require Self-Certification. Tenant-provided documents will be accepted but not required.

##### **3. Alimony or Child Support [Admin. Plan 7.3.D; ACOP 7.3.D]**

- a. SAHA will waive requirements for the family to provide evidence that it has taken all reasonable efforts to collect amounts due.
  - i. If a change of income is reported due to loss of child support, SAHA will process the change to be effective the first of the following month. SAHA may re-verify the change at any time.

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#### **4. Zero Income Declaration [Admin. Plan 6.3.A; ACOP 7.3.I]**

- a. When verifying zero income status, SAHA may waive requirements for the family to complete a Family Expense Summary or submit supporting documentation.

#### **5. Income Exclusions [Admin. Plan 6.1.M; ACOP 6.1.L]**

- a. When calculating income during annual reexamination or interim reexamination, SAHA will not consider any financial assistance received through The Coronavirus Aid, Relief, and Economic Security (CARES) Act as federally excluded disaster assistance.

#### **6. Repayment Policy [Admin. Plan 16.5.B; ACOP 13.3.D]**

- a. SAHA may suspend Repayment Agreements or alter repayment time periods, eligibility criteria or down payment requirements.

#### **7. Fees Charged for Non-Sufficient Funds**

- a. SAHA may suspend or alter late fees or Non-Sufficient Funds (NSF) fees.

#### **8. Informal Reviews and Hearings [Admin. Plan 16.3.C, 16.3.D; ACOP 14.1, 14.2.A, 14.3.H]**

- a. SAHA may conduct informal reviews and hearings by alternative means, such as video conferencing/call platform.
- b. SAHA may delay issuance of the hearing decision.

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#### **E. Administrative Plan Policy Amendments**

The following policies amend the current policies and procedures for the Housing Choice Voucher and other voucher programs covered under SAHA's Administrative Plan (Admin. Plan). Unless otherwise stated in the applicable waiver, these policies remain in effect until the expiration of the COVID-19 emergency declaration.

##### **1. Briefing [Admin. Plan 5.1.B; PIH 2020-05 HCV-2]**

- a. SAHA may conduct briefings by alternative means, such as video conferencing/call platform.

##### **2. Inspections [Admin. Plan 8.1.B, 8.2.F; PIH 2020-05 HQS-1, HQS-2]**

- a. SAHA may allow self-certification of repairs to certify corrections of up to ten (10) HQS owner deficiencies that are not considered life threatening.
- b. SAHA may accept self-certifications for infestation.

##### **3. Changes in Rent [Admin. Plan 13.1.C]**

- a. SAHA may delay processing of requested rental changes.

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#### **F. ACOP Policy Amendments**

The following policies amend the current policies and procedures for the Public Housing Program under SAHA's ACOP. Unless otherwise stated in the applicable waiver, these policies remain in effect until the expiration of the COVID-19 emergency declaration.

##### **1. Lease Execution [ACOP 8.1.C]**

- a. Any signatures required on the lease, and not obtained, at the time of occupancy may be obtained within a reasonable time frame, as stated in the written agreement, after the family has taken occupancy of the unit or after the expiration of the emergency declaration.

##### **2. Payments Under the Lease [ACOP 8.1.F]**

- a. Without altering the lease agreement, SAHA may extend time periods for issuing a 14-day Notice to Vacate in accordance with federal regulations.
- b. Without altering the lease agreement, SAHA may suspend or alter charges for maintenance or damages, or extend time periods for repayment in accordance with federal regulations.

##### **3. Reexaminations [ACOP 9.1.C, 9.1.D; PIH 2020-05 PH AND HCV-2]**

- a. SAHA may alter or extend time periods for completing the reexamination interview or the reexamination process.
- b. SAHA may only process decreases in earned and unearned income.

##### **4. Reexamination at Transfer [ACOP 12.4.F]**

- a. SAHA may waive requirements to perform a new annual reexamination at the time of move-in for transfers.
  - i. SAHA may perform the reexamination according to the resident's previous anniversary date and may sign a new lease at the time of the next reexamination.

##### **5. Changes in Income and Zero-Income Procedures [ACOP 9.3.C, 9.3.D]**

- a. SAHA may alter or extend the time period for reporting and/or processing increases in earned and unearned income.
- b. For families with a Total Tenant Payment (TTP) of \$50 or less, SAHA will only conduct an interim reexamination after six (6) months from the expiration of the emergency declaration.

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- i. Families reporting a change of income that brings their TTP to \$50 or less during the time of the emergency declaration will be subject to reexamination of income no sooner than six (6) months from the expiration of the emergency declaration.

#### **6. Community Service and Self-Sufficiency [ACOP Ch. 11; PIH 2020-05 PH-5]**

- a. SAHA may alter or waive annual community service and self-sufficiency requirements in accordance with federal regulations.