



Stanislaus Regional Housing Authority

ALPINE | AMADOR | CALAVERAS | INYO | MARIPOSA
MONO | STANISLAUS | TUOLUMNE COUNTIES

DATE: May 14, 2020

TO: Board of Commissioners

FROM: Barbara S. Kauss, Executive Director

Subject: **ACTION ITEM # 3-** Resolution approving the Housing Authority of the County of Stanislaus to Utilize Waivers as Allowed by the U.S. Department of Housing of Urban Development PIH Administrative Notice 20-05.

Resolution No. 19-20-17

RECOMMENDATION

Following review and discussion, staff recommends approval of the proposed 2020 Annual PHA Annual Plan and the 2020 HCV Administrative Plan and the Public Housing Admissions and Occupancy Plans for submission of the documents to the U.S. Department of Housing & Urban Development as required.

BACKGROUND

On April 10, 2020, the U.S. Department of Housing and Urban Development (HUD) released a series of waivers and program updates, 44 in total, for the Public Housing and Housing Choice Voucher (HCV) programs. The waivers were issued by HUD's Office of Public and Indian Housing (PIH) in *Notice PIH 2020-05, COVID-19 Statutory and Regulatory Waivers for the Public Housing, Housing Choice Voucher, Indian Housing Block Grant and Indian Community Development Block Grant programs, Suspension of Public Housing Assessment System and Section Eight Management Assessment Program.*

The purpose of the statutory and regulatory waivers is for HUD to assist PHAs in continuing to operate and provide critical housing services to their local communities. HUD provides a non-inclusive list of critical PHA functions which includes issuing vouchers so families can find housing, processing Requests for Tenancy Approvals (RFTAs) so families can be approved to move into a unit, processing requests for portability moves, ensuring occupancy of Public Housing units, processing minimum rent hardship exemptions, and completing reexaminations for participants who have experienced a decrease in income.

All waivers and alternative requirements provided in Notice PIH 2020-05 are effective as of April 10, 2020 and may be immediately adopted and implemented by the PHA. PHAs may adopt or revert to the standard program rules at any time during the period of availability (discussed in the next section below).

PHAs can adopt all, some, or none of the waivers at the discretion of the PHA. Some of the waivers have alternative requirements. For these waivers, the PHA must adopt the alternative



requirement as stated in the waiver. Alternative requirements will be discussed below in the specific waivers below.

PHAs do not need to notify HUD to adopt the waivers and alternative requirements listed in *Notice PIH 2020-05*. However, PHAs must maintain written documentation of the adopted waivers as HUD may require a PHA to provide HUD information on which waivers were implemented and the dates the PHA used each waiver.

PHAs must also notify the program residents and owners of any waiver and alternative requirements that it is adopting and the impact the that waiver and alternative requirement will have on the resident and owner. PHAs are reminded that resident and owner notice must be clearly communicated to remain in compliance with Section 504 of the Rehabilitation Act, HUD regulations, and the Americans with Disabilities Act requirements. HUD acknowledges communication challenges during this national emergency and reminds PHAs of their ability to place notice information on the PHA's website, provide notice information via voice-mail message, and provide follow up with formal written notice as circumstances allow.

The waiver and alternative requirement period of availability begins immediately on April 10, 2020, the issuance date of the notice. The waivers are generally broken into three periods of availability categories: short-term, ending on July 31, 2020; long-term, ending on December 31, 2020; and waiver-specific end dates – dates that are unique to the waiver that may be based on fiscal years or specific activities.

PHAs are not required to use the waiver for the full period of availability and may go back to the standard program requirements at any time. HUD, through PIH notice, may also extend the period of availability if deemed necessary.

FISCAL IMPACT

None

ATTACHMENTS

1. Waiver Summary Sheet
2. Waiver Request Letter
3. Resolution

**Attachment: Summary of Public Housing and HCV Waivers and Alternative Requirements
(Refer back to the Notice using the item code for a full description and more detailed information.)**

This chart summarizes the waivers authorized under this notice and the availability period for each. As stated in Section 5, PHAs must keep written documentation on the waivers applied by the PHA as well as the effective dates. To fulfill those requirements, PHAs may but are not required to utilize the last two columns to record this information.

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did PHA implement waiver and alternative requirement?	Date of PHA adoption
PH and HCV-1 PHA 5-Year and Annual Plan	<u>Statutory Authority</u> Section 5A(a)(1), Section 5A(b)(1), Section 5A(g), Section 5A(h) <u>Regulatory Authority</u> § 903.5(a)(3), 903.5(b)(3), 903.21	<ul style="list-style-type: none"> Alternative dates for submission Changes to significant amendment process 	<ul style="list-style-type: none"> Varies based on FYE 7/31/20 		
PH and HCV-2 Family income and composition – delayed annual reexaminations	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> § 982.516(a)(1), § 960.257(a)	<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 	<ul style="list-style-type: none"> 12/31/20 		
PH and HCV-3 Annual	<u>Regulatory Authority</u> § 5.233(a)(2)	<ul style="list-style-type: none"> Waives the requirements to use the income 	<ul style="list-style-type: none"> 7/31/20 		

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did PHA implement waiver and alternative requirement?	Date of PHA adoption
reexamination Income Verification	<u>Sub-regulatory Guidance</u> PIH Notice 2018-18	<p>hierarchy, including the use of EIV, and will allow PHAs to consider self-certification as the highest form of income verification</p> <ul style="list-style-type: none"> • PHAs that implement this waiver will be responsible for addressing material income discrepancies that may arise later 			
PH and HCV-4 Interim reexaminations	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> § 5.233(a)(2), 982.516(c)(2), 960.257(b) and (d) <u>Sub-regulatory Guidance</u> PIH Notice 2018-18	<ul style="list-style-type: none"> • Waives the requirement to use the income verification requirements, including the use of EIV, for interim reexaminations 	<ul style="list-style-type: none"> • 7/31/20 		
PH and HCV-5 EIV System Monitoring	<u>Regulatory Authority</u> § 5.233 <u>Sub-regulatory Guidance</u>	<ul style="list-style-type: none"> • Waives the mandatory EIV monitoring requirements. 	<ul style="list-style-type: none"> • 7/31/20 		

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did PHA implement waiver and alternative requirement?	Date of PHA adoption
	PIH Notice 2018-18				
PH and HCV-6 FSS Contract of Participation	<u>Regulatory Authority</u> § 984.303(d)	<ul style="list-style-type: none"> Provides for extensions to FSS contract of participation 	<ul style="list-style-type: none"> 12/31/20 		
PH and HCV-7 Waiting List	<u>Regulatory Authority</u> § 982.206(a)(2) PIH Notice 2012-34	<ul style="list-style-type: none"> Waives public notice requirements for opening and closing waiting list Requires alternative process 	<ul style="list-style-type: none"> 7/31/20 		
HQS-1 Initial inspection	<u>Statutory Authority</u> Section 8(o)(8)(A)(i), Section 8(o)(8)(C) <u>Regulatory Authority</u> § 982.305(a), 982.305(b), 982.405	<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. 	<ul style="list-style-type: none"> 7/31/20 10/31/20 		
HQS-2: <u>PBV Pre-HAP Contract Inspections, PHA acceptance of completed units</u>	<u>Statutory Authority:</u> Section 8(o)(8)(A) <u>Regulatory Authority:</u> §§ 983.301(b), 983.156(a)(1)	<ul style="list-style-type: none"> Changes 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. 	<ul style="list-style-type: none"> 7/31/20 10/31/20 		

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did PHA implement waiver and alternative requirement?	Date of PHA adoption
HQS-3 Non-Life Threatening HQS - Initial Unit Approval	<u>Statutory Authority</u> Section 8(o)(8)(A)(ii) <u>Regulatory Authority</u> HOTMA HCV Federal Register Notice January 18, 2017	<ul style="list-style-type: none"> Allows for extension of up to 30 days for owner repairs of non-life threatening conditions 	<ul style="list-style-type: none"> 7/31/20 		
HQS-4 Initial HQS - Alternative Inspections	<u>Statutory Authority</u> Section 8(o)(8)(A)(iii) <u>Regulatory Authority</u> HOTMA HCV Federal Register Notice January 18, 2017	<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. 	<ul style="list-style-type: none"> 7/31/20 10/31/20 		
HQS-5 Biennial Inspections	<u>Statutory Authority</u> Section 8(o)(D) <u>Regulatory Authority</u> §§ 982.405(a), 983.103(d)	<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 	<ul style="list-style-type: none"> 10/31/20 		

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did PHA implement waiver and alternative requirement?	Date of PHA adoption
		by no later than October 31, 2020.			
HQS-6 Interim Inspections	<u>Statutory Authority</u> Section 8(o)(8)(F) <u>Regulatory Authority</u> §§ 982.405(g), § 983.103(e)	<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 	<ul style="list-style-type: none"> • 7/31/20 		
HQS-7 PBV Turnover Inspections	<u>Regulatory Authority</u> § 983.103(c)	<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 	<ul style="list-style-type: none"> • 7/31/20 • 10/31/20 		
<u>HQS-8: PBV HAP Contract – HQS Inspections to Add or Substitute Units</u>	<u>Statutory Authority</u> Section 8(o)(8)(A) <u>Regulatory Authority</u> §§ 983.207(a), 983.207(b)	<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 	<ul style="list-style-type: none"> • 7/31/20 • 10/31/20 		

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did PHA implement waiver and alternative requirement?	Date of PHA adoption
HQS-9 HQS QC Inspections	<u>Regulatory Authority</u> § 982.405(b)	<ul style="list-style-type: none"> • Provides for a suspension of the requirement for QC sampling inspections 	<ul style="list-style-type: none"> • 10/31/20 		
HQS--10 HQS Space and Security	<u>Regulatory Authority</u> § 982.401(d)	<ul style="list-style-type: none"> • Waives the requirement that each dwelling unit have at least 1 bedroom or living/sleeping room for each 2 persons. 	Remains in effect one year from lease term or date of notice, whichever is longer		
HQS-11 Homeownership HQS	<u>Statutory Authority</u> Section 8(o)(8)(A)(i), Section 8(y)(3)(B) <u>Regulatory Authority</u> § 982.631(a)	<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 • 	<ul style="list-style-type: none"> • 7/31/20 		
HCV-1 Administrative Plan	<u>Regulatory Authority</u> § 982.54 (a)	<ul style="list-style-type: none"> • Waives the requirement to adopt revisions to the admin plan 	<ul style="list-style-type: none"> • 7/31/20 		
HCV-2 PHA Oral Briefing	<u>Regulatory Authority</u> § 982.301(a)(3) § 983.252(a)	<ul style="list-style-type: none"> • Waives the requirement for an oral briefing • Provides for alternative methods to conduct required voucher briefing 	<ul style="list-style-type: none"> • 7/31/20 		

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did PHA implement waiver and alternative requirement?	Date of PHA adoption
HCV-3 Term of Voucher - Extensions of Term	<u>Regulatory Authority</u> § 982.303(b)(1)	<ul style="list-style-type: none"> • Allows PHAs to provide voucher extensions regardless of current PHA policy • 	<ul style="list-style-type: none"> • 7/31/20 		
HCV-4 PHA Approval of Assisted Tenancy	<u>Regulatory Authority</u> § 982.305(c)	<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 	<ul style="list-style-type: none"> • 7/31/20 		
HCV-5 Absence from unit	<u>Regulatory Authority</u> § 982.312	<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 	<ul style="list-style-type: none"> • 12/31/20 		
HCV-6 Automatic Termination of the HAP Contract	<u>Regulatory Authority</u> § 982.455	<ul style="list-style-type: none"> • Allows PHA to extend the period of time after the last HAP payment is made before the HAP contract terminates automatically. 	<ul style="list-style-type: none"> • 12/31/20 		

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did PHA implement waiver and alternative requirement?	Date of PHA adoption
HCV-7 Increase in Payment Standard	<u>Regulatory Authority</u> § 982.505(c)(4)	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> 12/31/20 		
HCV-8 Utility Allowance Schedule	<u>Regulatory Authority</u> § 982.517	<ul style="list-style-type: none"> Provides for delay in updating utility allowance schedule 	<ul style="list-style-type: none"> 12/31/20 		
HCV-9 Homeownership Counseling	<u>Statutory Authority</u> Section 8(y)(1)(D) <u>Regulatory Authority</u> § 982.630, 982.636(d)	<ul style="list-style-type: none"> Waives the requirement for the family to obtain pre-assistance counseling 	<ul style="list-style-type: none"> 7/31/20 		
HCV-10 FUP	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> Allows PHAs to increase age to 26 for foster youth initial lease up 	<ul style="list-style-type: none"> 12/31/20 		
PH-1 Fiscal closeout of Capital Grant Funds	<u>Regulatory Authority</u> § 905.322(b)	<ul style="list-style-type: none"> Extension of deadlines for ADCC and AMCC 	Varies by PHA		
PH-2 Total	<u>Regulatory Authority</u> § 905.314(c)	<ul style="list-style-type: none"> Waives the TDC and HCC limits permitting 	Applies to development		

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did PHA implement waiver and alternative requirement?	Date of PHA adoption
Development Costs		approval of amounts in excess of published TDC by 25% to 50% on a case by case basis	proposals submitted to HUD no later than December 31, 2021		
PH-3 Cost limitations	<u>Regulatory Authority</u> § 905.314(j)	<ul style="list-style-type: none"> • Allows for the use of force account labor for modernization activities in certain circumstances • 	<ul style="list-style-type: none"> • 12/31/20 		
PH-4 ACOP	<u>Regulatory Authority</u> § 960.202(c)(1)	<ul style="list-style-type: none"> • Changes to approval process for ACOP 	<ul style="list-style-type: none"> • 7/31/20 		
PH-5 CSSR	<u>Statutory Authority</u> Section 12(c) <u>Regulatory Authority</u> § 960.603(a) and 960.603(b)	<ul style="list-style-type: none"> • Temporarily suspends CSSR 	<ul style="list-style-type: none"> • 3/31/21 		
PH-6 Energy Audits	<u>Regulatory Authority</u> § 965.302	<ul style="list-style-type: none"> • Allows for delay in due dates of energy audits 	One year beyond 2020 audit deadline		
PH-7 Over-income families	Housing Opportunity Through Modernization Act of 2016: Final Implementation of the Public Housing Income Limit 83 FR 35490	<ul style="list-style-type: none"> • Changes to timeframes for determination of over-income 	<ul style="list-style-type: none"> • 12/31/20 		

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did PHA implement waiver and alternative requirement?	Date of PHA adoption
	Notice: Notice PIH 2019-11				
PH-8 Resident Council Elections	<u>Regulatory Authority</u> § 964.130(a)(1)	<ul style="list-style-type: none"> Provides for delay in resident council elections 	<ul style="list-style-type: none"> 7/31/20 		
PH-9 Utility Allowance	<u>Regulatory Authority</u> § 965.507	<ul style="list-style-type: none"> Provides for delay in updating utility allowance schedule 	<ul style="list-style-type: none"> 12/31/20 		
PH-10 Tenant notifications	<u>Regulatory Authority</u> § 966.5	<ul style="list-style-type: none"> Advance notice not required except for policies related to tenant charges 	<ul style="list-style-type: none"> 7/31/20 		
11a PHAS	<u>Regulatory Authority</u> 24 CFR Part 902	<ul style="list-style-type: none"> Allows for alternatives related to inspections PHA to retain prior year PHAS score unless requests otherwise 	HUD will resume issuing new PHAS scores starting with PHAs with FYE dates of 3/31/21	N/A	N/A
11b SEMAP	<u>Regulatory Authority</u> 24 CFR Part 985	<ul style="list-style-type: none"> PHA to retain prior year SEMAP score unless requests otherwise 	HUD will resume issuing new SEMAP scores starting with PHAs with FYE dates of 3/31/21	N/A	N/A
11c Financial reporting	<u>Regulatory Authority</u> §§ 5.801(c), 5.801(d)(1)	<ul style="list-style-type: none"> Allows for extensions of financial reporting deadlines 	Varies by PHA FYE		

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did PHA implement waiver and alternative requirement?	Date of PHA adoption
12a Form HUD 50058	<u>Regulatory Authority</u> 24 CFR Part 908, § 982.158 <u>Sub-regulatory Guidance</u> PIH Notice 2011-65	<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 	<ul style="list-style-type: none"> • 12/31/20 		
12b Designated housing plan	<u>Statutory Authority</u> Section 7(e)(1)	<ul style="list-style-type: none"> • Allows for HUD to delay notification about designated housing plan 	<ul style="list-style-type: none"> • 7/31/20 	N/A	N/A
12c Deadline for reporting Operating and Capital Fund expenditures	<u>Statutory Authority</u> Section 9(j) <u>Regulatory Authority</u> § 905.306(d)(5)	<ul style="list-style-type: none"> • Provides a one-year extension 	One-year extension, however no programmatic expenditure end date shall be extended beyond one month prior to closure of relevant appropriations acc		



Stanislaus Regional Housing Authority

ALPINE | AMADOR | CALAVERAS | INYO | MARIPOSA
MONO | STANISLAUS | TUOLUMNE COUNTIES

April 10, 2020

Mr. Gerard Windt, Director
Public and Indian Housing Division
U.S. Department of Housing and Urban Development
One Sansome Street, Suite 1200
San Francisco, CA 94104

RE: Waiver Request for Housing Authority of the County of Stanislaus

Dear Mr. Windt:

Please be advised that as a result of the President and Governor ordering citizens to stay at home, the Housing Authority closed the office to the public on 3/18/20 and agency staff are now working remotely.

The Housing Authority has initiated its' **"BUSINESS CONTINUITY PLAN"** whereby all employees are telecommuting. The Housing Authority is open and continues to provide services to all clients (including program participants, vendors, and property owners), but under significantly reduced capacity.

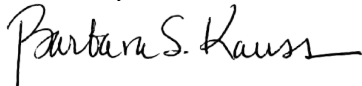
Due to the uncertainty of the timeframe the agency will be working at reduced capacity, the full impact on annual planning and goals remains unknown. The Housing Authority management staff are working daily to ensure processes continue so that agency goals and timelines are met. However, the closure of the agency has had a severe impact on the processing of such work and threatens the agency's ability to remain a "High Performing Agency" with HUD. As such, the Housing Authority is requesting waivers for the following regulatory requirements:

- Waiver of Lease-up requirements for the VASH and FUP Programs due to limited services from agencies who provide assistance with housing search and other necessary supportive services.
- Request a waiver of the 1-year "benefit-free" requirement for graduation of FSS participants who became unemployed due to company shut-down during the last year of their FSS Contract or authorization to extend the Contract of Participation for an additional year.
- Waiver to extend the submission due date for the ROSS program 120 days beyond the 10/30/20 due date. Services are severely limited for program participants at this time and additional time will need to be provided to meet ROSS annual goals.



The Housing Authority respectfully requests HUD consider these waivers as these challenging times have created obstacles that will prevent the agency from meeting goals consistent with HUD and the Housing Authority's mission. The request for the waivers contained in this request were either not addressed or not fully addressed in HUD's PIH Notice 2020-5. The Housing Authority looks forward to a favorable response to this request and staff wish you well and hope that HUD staff stay safe and healthy.

Sincerely,

A handwritten signature in black ink that reads "Barbara S. Kauss". The signature is written in a cursive style with a long horizontal flourish at the end.

Barbara S. Kauss
CEO/Executive Director



Stanislaus Regional Housing Authority

ALPINE | AMADOR | CALAVERAS | INYO | MARIPOSA
MONO | STANISLAUS | TUOLUMNE COUNTIES

RESOLUTION NO. 19-20-17

RESOLUTION APPROVING THE HOUSING AUTHORITY OF THE COUNTY OF STANISLAUS TO UTILIZE WAIVERS AS ALLOWED BY THE U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT PIH ADMINISTRATIVE NOTICE 20-05.

WHEREAS: The U.S. Department of Housing & Urban Development (HUD) issued PIH Administrative Notice 20-05 on Friday April 10th, 2020;

WHEREAS: The Notice covered a variety of waivers and administrative exceptions that HUD is willing to grant to all public housing agencies to address the requirements of social distancing for the duration of any federal, State, or local directives or Executive Orders that call for minimization of public contact and public interactions;

WHEREAS: The Notice contains language that applies to administrative activities related to applicants and existing program participants for both the Low-Income Public Housing (LIPH) program and the Housing Choice Voucher (HCV) Program. It covers verification of household eligibility and income data and language that applies to Landlords concerning all unit inspections;

WHEREAS: The Notice generally requires a housing agency to opt in by July 31, 2020 to those waivers that it elects to implement. In addition, some waivers are deemed “short term” and terminate July 31, 2020 and some are deemed “long term” and terminate December 31, 2020;

WHEREAS: Most of the key administrative relief granted in the Notice is the ability of the Authority to rely on self-certifications where 3rd party or actual physical inspections or meeting were required. The Notice makes clear that all self-certifications are subject post-audit and enforcement for false certification. All housing agencies are also granted authority to be as expansive as need be in terms of specific language in the self-certification forms;

WHEREAS AND FURTHERMORE: Administrative flexibility is required to allow the Executive Office to respond to rapidly changing circumstances and make decisions on a situation-by situation basis; and

NOW, THERE, LET IT BE RESOLVED: that the Board of Commissioners of the Housing Authority of the County of Stanislaus hereby authorize the Executive Director to:

- 1) Take all necessary steps required to Implement any waiver or exception listed in PIH Administrative Notice 20-05, or not, based on a balancing of the best interest of the public, the Housing Authority employees, HCV and Public Housing Program Administrator 's staff, the program participants and Program Integrity and compliance requirements.



- 2) Ensure the HCV and Public Housing Program Administrators to design and implement all required self-certification forms that meet the HUD minimum requirements as well as Housing Authority needs in order to maintain program integrity and support a vigorous post-audit process on applicants, program participants and HCV Landlords.
- 3) Ensure the HCV and Public Housing Program Administrator to maintain the information that HUD requires as to which waivers or exceptions are implemented and a list of the **households** that benefited from the waivers as well as a list of any HCV and Public Housing **units** subject to initial lease-up, HAP renewal or program participant complaint about unit physical compliance that benefited from the waivers or exceptions .
- 4) Authority to implementation of all identified waivers is retroactive to April 13, 2020.
- 5) This resolution shall take effect immediately.

DULY AND REGULARLY ADOPTED by the Board of Commissioners of the Housing Authority of the County of Stanislaus this 9th day of April, 2020.

On motion of Commissioner _____, seconded by Commissioner _____ and on the following roll call vote:

AYES:

NAYS:

ABSENT:

ABSTAIN:

Approved: _____
Chairperson

Attest: _____
Secretary