



CLPHA Member Call on COVID-19 Regulatory Relief

March 16, 2020 | 1:00 p.m. ET

SUMMARY

On March 16, CLPHA hosted a call with members to review HUD communications about the COVID-19 response, discuss any waivers needed by PHAs, and provide an overview of legislative actions. Call notes are available here and posted on CLPHA's COVID-19 website at [CLPHA.org/COVID19](https://clpha.org/COVID19).

On the call, we discussed HUD's limited communications to PHAs so far in response to the pandemic. HUD has a webpage, hud.gov/coronavirus, where different resources are being posted, and over the weekend HUD posted an FAQ for PIH [concerns](#). The FAQ directs PHAs to submit waiver requests to a specific email address where requests will be expedited, but the scope of waivers being entertained by HUD is unclear and due to the volume of waivers needed by PHAs at this time, this is likely an inefficient process.

CLPHA heard about a number of needed waivers during the call, including HQS inspection suspension, extensions or delays on requirements such as REAC reporting and PIC submissions, extensions for LIHTC and RAD requirements. A full list of waivers are included in the call notes. Members also discussed needed guidance, such as guidance on digital signatures and administering paperwork in a remote work setting. We have shared these needs for waivers and guidance with HUD and will be in regular contact with HUD staff about the status of HUD's plans moving forward.

Should you think of other needs your agency has for waivers or guidance, please share them with Senior Research & Policy Analyst Emily Warren at ewarren@clpha.org.

CALL NOTES

Sunia Zaterman, CLPHA

- Thank you for joining this call
- CLPHA staff will all be working remotely beginning tomorrow (3/17)
- We will be having regular member calls related to COVID-19 and will update members soon on our call schedule
- This call will cover regulatory relief, statutory waivers, and funding relief that would help PHAs during COVID-19

Emily Warren, CLPHA

- This call will cover HUD-related COVID-19 actions and regulations thus far
- So far, HUD has created a [COVID-19 website](#) and a [PHA FAQ](#) that does not answer all of the questions that CLPHA submitted to HUD and is not as helpful as it could be
- HUD has told us they are concerned about being swamped with waiver requests, is looking at blanket waiver authority
- Questions/issues you have that were not covered by HUD FAQ?

Angela Adams, Housing Authority of the City of Los Angeles

- FAQ did not speak to HCV inspections

Rishad Mitha, Housing Authority of the County of San Bernardino

- We would like guidance on imminent client move-ins, is HUD ok with allowing the move-in if the HQS has not taken place?

Grace Campion, District of Columbia Housing Authority

- FAQ did not discuss evictions explicitly, would like more specific local-level guidance that we can share with our local advocacy groups

Brian Gage, Akron Metropolitan Housing Authority

- Our tenants accounts receivable will be higher and this will affect our PHAS score

Kerry Coughlin, Seattle Housing Authority

- Our mayor issued a directive over the weekend banning evictions for non-payment, other cities may follow suit

Lowel Krueger, Yakima Housing Authority

- FAQ does not give leeway with documentation for interim recertifications

Gail Livingston, Boston Housing Authority

- BHA and the City of Boston have told their housing court they will not be moving forward with any evictions

Deborah, Housing Authority of the City of Los Angeles

- One-year waiver regarding TARS number under PHAs would be helpful

Ed Lowndes, Housing Authority of Kansas City, MO

- Courts themselves in Kansas City have put a moratorium on landlord/tenant actions for at least the next month
- Re: tenant reduction of income – do we consider this permanent or temporary? This may only last a few weeks or it may last longer for some residents

Andria Lazaga, Seattle Housing Authority

- For things that require signatures, doing things remotely can be really challenging as libraries, schools, and other services close (this makes it harder for residents to print, sign, and scan documents) – would like alternative ways of processing things that require signature because it will be really hard to go back and get these signatures when this period is over
 - Example paperwork that we'd like to have waiver for is disbursement of FSS emergency funds
- Would love to see suspension of community service requirement for public housing residents during this time

Emily Warren, CLPHA

- Other regulatory waivers on your wish lists?

Monica Foucher, Home Forward

- Overall 90-day extension for:
 - EIV interim certifications
 - REAC inspections
 - Time frame for tenant income certification on tax credit projects
 - Extension of time frames of RAD projects
 - PIC submissions
 - Voucher management submissions
 - REAC reporting that is due March 31

Brian, Akron Metropolitan Housing Authority

- Capital fund obligation deadline should be extended
- Delaying our 5-year strategic plan right now due to COVID-19 so an extension on that would be helpful

Ed Lowndes, Housing Authority of Kansas City, MO

- Semi-annual Davis-Bacon labor standards report that is due April 5, basically any report with upcoming due date should be extended

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- Has anyone implemented virtual commissioners' meetings?

Kim Cole, INLIVIAN

- Yes, we're having them via conference call

Kerry Coughlin, Seattle Housing Authority

- Seattle as well

Donna Dixon, Houston Housing Authority

- How did you get the word out about phone commissioner meetings to the public and allow them to join?

Andria Lazaga, Seattle Housing Authority

- When we held our board meeting last week, commissioners called in but we had a space for people to come in and listen if they wanted, now given the situation we are looking at other options for people to visit virtually

Kim Cole, INLIVIAN

- INLIVIAN asked people to email them if they wanted to join the commissioner conference call so that INLIVIAN could share conference call info with people individually

Taylor Smiley Wolfe, Home Forward

- IRS waivers for LIHTC properties?
 - Relief on lease-up timelines, tenant income certifications, etc.

Emily Warren, CLPHA

- Statutory waiver wish list?

Andria Lazaga, Seattle Housing Authority

- Community service requirements would be statutory

Emily Warren, CLPHA

- Please email me at ewarren@clpha.org if you have any additional regulatory or statutory waiver requests

Gerard Holder, CLPHA

- Congress is working on a second funding package, H.R. 6201: "The Families First Coronavirus Response Act" – has a lot in it, but not a lot for housing specifically – deals a lot with food and nutrition services, coronavirus testing, sick leave, unemployment, etc.
- Contacted by the House THUD Subcommittee Chairman David Price's office on Friday to ask how PHAs were faring with coronavirus – wanted to know if PHAs needed more resources to cover their unexpected costs
 - CLPHA told them about needs for cleaning costs, rent losses, staff overtime wages

- Also told them we had heard about issues with resident food insecurity, loss of childcare services at PHAs, etc.
- Bill has been bogged down, Speaker Pelosi and Treasury Secretary Mnuchin are involved in high-level negotiations on this bill but there is no time frame as to when this bill will move the Senate – hopefully by the end of the week
- Nothing in the bill that is specific to housing, is not overly optimistic that we will be able to get more housing-specific funding in there
- CLPHA was also contacted by CBPP this morning because they're looking to also make the case for funding for public housing and other housing issues; are concerned with loss of PHA revenue due to drops in rent

Sunia Zaterman, CLPHA

- Want to reiterate that this funding is imperative – we have to start making the case that this funding is crucial
- What is the order magnitude for your PHAs on the impact you'll see to your revenue, bottom line, etc.?

Lowel Krueger, Yakima Housing Authority

- We are still trying to determine how our paid time off policy will be affected by what is being proposed in H.R. 6201

Gerard Holder, CLPHA

- H.R. 6201 guarantees two weeks of paid sick leave, which is a big point of contention between the White House and the Speaker

Taylor Smiley Wolfe, Home Forward

- We are looking at a moratorium on non-payment evictions, looking for help from community partners for financial help with reimbursement for this

Ed Lowndes, Housing Authority of Kansas City, MO

- Increased cost for equipment – hazmat suits, masks that are disposable are crucial and were not budgeted for in the capital fund so any additional funds for that would be helpful

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- If this turns into a recession we will see a big decrease in revenue due to residents' loss of income

Ed Lowndes, Housing Authority of Kansas City, MO

- Lease up rates and utilizations will go down due to these circumstances which will also hurt us financially

Katrina Redmon, Wilmington Housing Authority

- Already seeing decrease in ability for tenants to pay rent since our residents' major employment centers are closing, and we don't even have any cases in our county yet

Michael Gerber, Housing Authority of the City of Austin

- Can we put together a spreadsheet that maps our PHAs' costs and revenue losses that will show the impact on us collectively?

Sunia Zaterman, CLPHA

- Can you discuss the process of changing your operating procedures in your communities, especially your communities with seniors and other vulnerable populations?
- Potential for PHAs to be food distribution centers for those facing food insecurity during this time?

Gail Livingston, Boston Housing Authority

- Have been continuing to run our meal programs and food pantries but are working with partners to put safety protocols in place – trying to maintain as many of these lifeline programs as we possibly can
- One local issue is managing entry to senior communities – we’re going to do some signage outside our buildings asking people to be safe and mindful when visiting – anyone else dealing with this?

Ed Lowndes, Housing Authority of Kansas City, MO

- We are doing similar signs, installing drop boxes at their offices for people who need to drop off documents so that they don’t have to come into the building

Jeffery Patterson, Cuyahoga Metropolitan Housing Authority

- Our governor has been very aggressive in terms of closing schools, bars, and restaurants, expect he will take further steps to limit interaction as the week goes on
- We are concerned with our residents being able to get basic necessities such as groceries, toiletries, cleaning supplies, etc.
- We are having to do a lot of additional comprehensive cleaning for a sustained period of time, which will be expensive
- Things that may not be significant problems may become problems as time goes on, so we need to look ahead at future issues

Sunia Zaterman, CLPHA

- Agree that we need to treat this as a long-haul issue

Gerard Holder, CLPHA

- We are right now in the budget season where committees are putting together their budget asks for the coming year, so what we have to do now is to build enough into the budget to address these aforementioned added costs

Sunia Zaterman, CLPHA

- We also have to think about how we can mitigate what is currently going on and also build in long-term preparedness and think through what we would need in case something like this happens in the future

Jeffery Patterson, Cuyahoga Metropolitan Housing Authority

- One issue we’re struggling with is remote work – it’s not easy for all jobs and it’s not easy given current technology – would be good to look at what we need to enable remote work and remote communication with HUD, residents, etc. and start to put a price tag on it

Steve Lucas, CLPHA

- Be on the look out for future emails from CLPHA about standing COVID-19 calls and a webinar later this week
- [Join our COVID-19 HousingIs.org community](#)
- [Clpha.org/covid19](#) – all of our resources and call notes will be posted here, please share your resources with us