



ST. LOUIS  
**HOUSING**  
AUTHORITY

# Agency Plan

Annual Plan for Fiscal Year 2022

# Draft

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Submitted by:

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Executive Director

July 15, 2022

**St. Louis Housing Authority**  
**FY 2022 Annual Plan**

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**ATTACHMENT #1**

**Section A.1 – PHA Information**  
**Availability of Information**

**SLHA maintains relevant information regarding the Agency Plan at on its website ([www.slha.org](http://www.slha.org)), main administrative office and at each Asset Management Developments Listed Below:**

1. St. Louis Housing Authority, 3520 Page Boulevard, St. Louis, MO 63106
2. Clinton-Peabody – MO001-000002, 1401 LaSalle Street, St. Louis, MO 63104
3. James House – MO001-000010, 4310 St. Ferdinand, St. Louis, MO 63113
4. Euclid Plaza –MO001-000013B, 5310 N. Euclid, St. Louis, MO 63115
5. McMillan Manor (North Side Scattered Sites) – MO001-000041,051  
1007 N. Taylor, St. Louis, MO 63108
6. West Pine – MO001-000017, 4490 West Pine, St. Louis, MO 63108
7. Parkview Apartments – MO001-000019, 4451 Forest Park, St. Louis, MO 63108
8. Lafayette Apartments (South Side Scattered Sites) – MO001-000038  
3447 Lafayette, St. Louis, MO 63104
9. Badenhause & Badenfest – MO001-000028, 8450 Gast Place, St. Louis, MO 63147
10. LaSalle Park – MO001-000034, 1001 Hickory, St. Louis, MO 63104
11. Cochran Plaza – MO001-000037, 1420 N. 10<sup>th</sup> Street, St. Louis, MO 63106
12. Murphy Park I, II & III – MO001-000044,045,046  
1920 Cass Avenue, St. Louis, MO 63106
13. King Louis Square I – MO001-000047, 1524 S. 13<sup>th</sup> Street, St. Louis, MO 63104
14. King Louis Square II – MO001-000049, 1129 Hickory Street, St. Louis, MO 63104
15. Les Chateaux – MO001-000048, 1330 Chouteau, St. Louis, MO 63103
16. Renaissance Place at Grand I, II, & III – M036-P001-050, 057,059  
1001 N. Compton, St. Louis, MO 63106
17. Senior Living and Gardens at Renaissance Place – M0001-000054, and MO001-000055  
3217 Martin Luther King, St. Louis, MO 63106
18. Cahill House – MO001-000056, 1919 O’Fallon Place, St. Louis, MO 63106
19. Cambridge Heights I & II – MO001-000058,060, 703 O’Fallon, St. Louis, MO 63106
20. Kingsbury Terrace – MO001-000061, 5655 Kingsbury, St. Louis, MO 63112
21. Senior Living at Cambridge Heights - MO001-000062, 728 Biddle, St. Louis, MO 63106
22. Arlington Grove – MO001-000063, 5547 Dr. Martin Luther King, St. Louis, MO 63112
23. North Sarah I, II & III Apartments - MO001-000064,065, 066  
1024 North Sarah, St. Louis, MO 63113
24. Preservation Square I – MO001-000067, 1406 N. 16<sup>th</sup> Street, St. Louis MO 63106

**Detailed information regarding the Agency Plan components can be viewed at the SLHA website, [www.slha.org](http://www.slha.org). Due to COVID 19 restrictions and protocols, the Agency Plan and all relevant components are available for viewing by appointment only at the SLHA’s Central Office, located at 3520 Page Blvd., St. Louis, MO 63106. The SLHA’s Admissions and Continued Occupancy Policies can only be viewed online or by appointment. To scheduling a viewing appointment, please contact Fran Bruce at (314) 286-4365 or by email at [fbruce@slha.org](mailto:fbruce@slha.org).**

**All resident organizations are provided a copy of the Agency Plan.**

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**St. Louis Housing Authority**  
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**ATTACHMENT #2**

**Section B.1 (b) – PHA Plan Update – Plan Elements Revised**

**Item 1 – Statement of Housing Needs**

In accordance with HUD Requirements, the PHA is required to assess the housing needs within the community as a part of its Annual Plan. Based on available data, the PHA is required to make reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The PHA is required to rate the impact of the following factors on the housing needs of families using a scale of 1 to 5 with 1 considered “no impact,” and 5 being “severe impact.”

- **Affordability** - the impact of rent burden (i.e., rent comprising more than 30 percent of income) or severe rent burden (i.e., rent comprising more than 50 percent of income);
- **Supply** - the impact of the shortage of units available for occupancy;
- **Quality** - the prevalence of units in substandard physical condition;
- **Accessibility** - the availability of units that are accessible for persons with mobility impairments;
- **Size** - considers any mismatch between the units available and family sizes; and
- **Location** – the extent to which the supply of units’ available limits housing choices for families to particular locations, notably areas of poverty/minority concentration.

The Statement of Housing needs is included on the following table: *Housing Needs of Families in the Jurisdiction by Family Type*. In order to maintain consistency, the same methodology was used for 2022 as in previous although the data is limited in some categories and may not reflect current market conditions. The St. Louis Housing Authority is located in a jurisdiction identified by HUD to have significant rental market fluctuations and has been approved for an increase in payment standards for Housing Choice Vouchers up to 120 percent of the FMR. In addition, the jurisdiction is currently experiencing many affordable housing challenges due to ongoing effects from COVID including but not limited to a lack of affordable units, increasing housing costs and increasing construction costs.

## Housing Needs of Families in the Jurisdiction by Family Type

Family Type	Overall	Affordability	Supply	Quality	Accessibility	Size	Location
Income <= 30% of HAMFI	33,585	4	*	4	*	*	*
Income >30.1% but <=50% of HAMFI	20,365	4	*	4	*	*	*
Income >50.1% but <80% of HAMFI	26,095	2	*	2	*	*	*
Elderly	35,175	2	*	2	*	*	*
Population with Disabilities	94,000	*	*	3	*	*	*
Caucasian, Non-Hispanic	67,925	2	*	1	*	*	3
African American, Non-Hispanic	61,680	3	*	2	*	*	5
Asian or Pacific Islander, Non-Hispanic	3,880	3	*	2	*	*	4
Hispanic	4,274	3	*	2	*	*	4
Other, Non-Hispanic	2045	3	*	2	*	*	*

**Notes: Numbers reflect population or households, renters and homeowners; Elderly = 62+; Grading was established such that 1=0-20%, 2=20.1-40%, 3=40.1-60%, 4=60.1-80%, 5=80.1-100%; Data taken from AFFH version 0006, Map 6, "housing problems" tables 1, 9 & 12 and CHAS data 2014-2018, tables 5, 6, 7, 9, & summary table.**

**\*There is no data available to make determinations in the indicated categories.**

In addition to the data included in the table, the St. Louis Affordable Housing Report Card (2021) had several key findings related to the Housing Needs included in their recent report (<https://www.affordablestl.com/>). Some of the key findings include a lack of affordable housing for extremely low-income individuals (at or below 30% of AMI). In St. Louis City and County, there is a gap of approximately 35,000 affordable units needed—28,000 1-bedrooms, 7,000 2-bedrooms, and 1,900 3-bedroom. The report also issued Affordable Housing Grades for different groups. The following groups are also included in the Housing Needs of Families Table for St. Louis City and County:

### Affordable Housing Grades – Select Groups *St. Louis Affordable Housing Report Card (2021)*

All Households	C
Households with Income from 0-30% AMI	F
Households with Income from 31-50% AMI	F
Households with Income from 51-80% AMI	D
White Households	C
Black Households	F

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**ATTACHMENT #3**

**Section B.1 (b) – PHA Plan Update – Plan Elements Revised**

**Item 2–Deconcentration and Other Policies that Govern Eligibility, Selection & Admissions**

**Administrative Plan (Section 8 Housing Choice Program) - Changes  
Admissions and Continued Occupancy Policy (ACOP) – Matrix of Changes**

- Section 8 /Housing Choice Voucher Program: *Revisions since last Annual Plan Submission:*

**Administrative Plan:**

Revisions to the Administrative Plan – Matrix provides summary of changes (Attachment 3A).

Updates to High Opportunity Areas Rents and Payment Standards – Appendix 1 - Mobility Connection Program (Attachment 3B).

HUD PIH Notice 2021-14 – (New Appendix 2 to Administrative Plan) (Attachment 3C) - HUD has established waivers and administrative flexibilities to PHAs’ in response to the COVID-19 that provide alternatives to established procedures in the the Administrative Plan. (Reference Attachment #3G).

- Public Housing: - St. Louis Housing Authority’s Admissions and Continued Occupancy Policy (ACOP) contains the provisions for Eligibility, Selection and Admissions Policies including Deconcentration and Wait List Procedure for Public Housing Residents. *Revisions since last Annual Plan Submission:*

**Admissions and Continued Occupancy Policy (ACOP)**

Revisions to the ACOP, a component of the Agency Plan, have been made and therefore, are subject to public review and comment. The ACOP comment period is concurrently with this plan. The ACOP is under a separate cover and not an attachment to this plan update.

Revisions to the ACOP – Matrix provides summary of changes (attachment 3D).

Income Limits Chart (ACOP Appendix #2) - HUD annually revises the Income Limits to adjust to the average median income levels (Attachment 3E).

Flat Rent Comparables (ACOP Appendix #3) – SLHA annually revises the Flat Rent Comparables to adjust rent limits comparable to local area rents (Attachment 3F). (Reference Attachment 5).

HUD PIH Notice 2021-14 – (ACOP Appendix #5) - HUD has established waivers and administrative flexibilities to PHAs' in response to the COVID-19 that provide alternatives to established procedures in the the ACOP (Attachment 3G).

Site Based Waiting List - SLHA created a site-based waiting list for Preservation Square (MO001000067) in March 2022. SLHA number of Site Based waiting lists is 25.

Waiting Lists Openings - In FY 2022, SLHA expects to re-open the Waiting Lists for several SLHA properties. Reference attached table containing all Waiting Lists by Locations (Attachment 3H).

## HCV Administrative Plan – Changes/Additions 2022

Chapter	Current	Change/Addition/Comment	Page
Appendix 1	Last update 10/2020	Updates to high opportunity areas, median rents and payment standards for Mobility Connection Program	Appendix 1
Administrative Plan Appendix 2 (New) HUD COVID-19 Statutory and Regulatory Waivers HUD Notice PIH 2021-14	N/A	HUD has established waivers and administrative flexibilities to PHAs' in response to the COVID-19 that provide alternatives to established procedures in the the Administrative Plan. See Appendix 2 for PIH Notice 2021-14 which includes a summary of waivers, alternative requirements, and extended availability periods.	Appendix 2



## APPENDIX 1

### [Address Locator — Ascend \(ascendstl.org\)](#)

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Clients and property owners can use the above Address Locator link to determine if a property is in a High Opportunity Area and the highest rental price the Housing Authority can pay for a unit in that area by voucher size. Rent price limits are divided into three tiers and detailed in the table below.

The numbers displayed in the table are for clients with \$0 income using average utility allowances. Families with income can afford higher rental amounts. If you think the utilities for the unit might be higher than average, the top rent the family can afford will be lower. For more on what families can afford, click this link to the [FAQ page](#)

Instructions for using the Address Locator:

1. **Enter the address of the property** by typing the address into the top right-hand corner of the map. The map will find the property and open a table with “search results.”
2. **Click on an area around the property** and a new table will pop up with more information.
3. **The table tells you the information**, including whether or not the address is in a High Opportunity Area, the tier level, and the price limit by voucher size in that neighborhood.
4. To search a new address simply click on the magnifying glass button at the top right of the map and type in the new address.

The higher the tier, the higher amount the Housing Authority can contribute towards the rent. Users can also click on the double arrow symbol on the top left-hand corner and add additional layers to the map to show zip codes and school districts.

## Rental Price Limits

<b>VOUCHER SIZE</b>	<b>TIER 1</b>	<b>TIER 2</b>	<b>TIER 3</b>
<b>STUDIO</b>	<b>\$670</b>	<b>\$730</b>	<b>\$830</b>
<b>1 BDR</b>	<b>\$650</b>	<b>\$720</b>	<b>\$840</b>
<b>2 BDR</b>	<b>\$825</b>	<b>\$915</b>	<b>\$1,060</b>
<b>3 BDR</b>	<b>\$1,080</b>	<b>\$1,200</b>	<b>\$1,390</b>
<b>4 BDR</b>	<b>\$1,260</b>	<b>\$1,400</b>	<b>\$1,625</b>
<b>5 BDR</b>	<b>\$1,500</b>	<b>\$1,665</b>	<b>\$1,930</b>
<b>6 BDR</b>	<b>\$1,665</b>	<b>\$1,845</b>	<b>\$2,145</b>
<b>7 BDR</b>	<b>\$1,895</b>	<b>\$2,100</b>	<b>\$2,430</b>

[Learn More — Ascend \(ascendstl.org\)](http://ascendstl.org)

**St. Louis Housing Authority**  
**FY 2022 Annual Plan**

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**ATTACHMENT #3C**

**Section B.1 (c) – PHA Plan Update – Plan Elements Revised**

**Item 2–Deconcentration and Other Policies that Govern Eligibility, Selection & Admissions**

**Administration Plan (Section 8/Housing Choice Voucher Program) – Matrix of Changes  
Admissions and Continued Occupancy Policy (ACOP) – Matrix of Changes**

HUD PIH Notice 2021-14 (HA) Rev-3, (Admin. Plan Appendix #2) – COVID-19  
Statutory and Regulatory Waivers.

COVID-19 Statutory and Regulatory Waivers and Alternative Requirements for the Public Housing, Housing Choice Voucher (including Mainstream and Mod Rehab), Indian Housing Block Grant and Indian Community Development Block Grant programs, Suspension of Public Housing Assessment System and Section Eight Management Assessment Program, Revision 3.

The Admissions and Continued Occupancy Policy (ACOP) Matrix of revisions has been revised to incorporate the St. Louis Housing Authority COVID-19 Tracking Sheet of waivers and alternative requirements as adopted.

**REFERENCE ATTACHMENT 3G**

# Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2022

Chapter	Current	Change/Addition/Comment	Page
<p>Chapter 17 Inspections</p> <p>17.6.3 Emergency Repairs</p>	<p>When conditions in the unit are hazardous to life, health or safety, SLHA will make repairs or otherwise abate the situation within 24 hours. Defects hazardous to life, health or safety include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Any condition that jeopardizes the security of the unit</li> <li>• Major plumbing leaks or flooding, waterlogged ceiling or floor in imminent danger of falling</li> <li>• Natural gas leaks</li> <li>• Any electrical problem or condition that could result in shock or fire</li> <li>• Absence of a working heating system when outside temperature is below 60 degrees Fahrenheit</li> <li>• Utilities not in service, including no running hot water</li> <li>• Conditions that present the imminent possibility of injury</li> <li>• Obstacles that prevent safe entrance or exit from the unit</li> <li>• Absence of a functioning toilet in the unit (if only 1 in unit)</li> <li>• Inoperable smoke detectors</li> </ul>	<p>HUD Notice PIH 2022-01 requires the installation of Carbon Monoxide (CO) alarms or detectors in certain Federally Assisted Housing by December 27, 2022.</p> <p>“Inoperable carbon monoxide detectors” will be added to the existing list of emergency repairs.</p>	<p>17-3</p>

# Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2022

<p><b>Chapter 17</b> <b>Inspections</b></p> <p><b>17.7 Intentionally Disengaging Smoke Detectors</b></p>	<p>Notices of lease violation will also be issued to residents who purposely disengage the unit's smoke detector. Disengagement includes disabling the smoke detector; removing smoke detector; failing to properly maintain the detector, removing batteries and failing to replace them; if applicable, failing to report a malfunctioning detector, unplugging a detector (inside its mounting box); or allowing it to dangle by its wiring or covering it.</p>	<p>HUD Notice PIH 2022-01 requires the installation of Carbon Monoxide (CO) alarms or detectors in certain Federally Assisted Housing by December 27, 2022. Section will be updated to include carbon monoxide detectors in addition to smoke detectors.</p> <p>Update Section:</p> <p>Notices of lease violation will also be issued to residents who purposely disengage the unit's smoke and/or carbon monoxide detector(s). Disengagement includes disabling the detector; removing the detector; failing to properly maintain the detector, removing batteries and failing to replace them; if applicable, failing to report a malfunctioning detector, unplugging a detector (inside its mounting box)</p>	<p>17-3</p>
<p><b>Chapter 22</b> <b>Lease Terminations</b></p> <p><b>22.1.2.3 Notice Timing Requirements</b></p>	<p>22.1.2.3 Notice Timing and Requirements SLHA shall give written notice of the proposed termination of the lease:</p> <ul style="list-style-type: none"> <li>• 14 days in the case of failure to pay rent</li> <li>• 10 days for criminal activity or any activity that threatens the safety and welfare of other residents, SLHA employees or persons residing in the immediate vicinity of the premises</li> <li>• 60 days for over-income households</li> <li>• 30 days in any other case</li> </ul>	<p>HUD Notice PIH 2021-29 requires a minimum of 30-day notice to support families at risk of eviction for non-payment of rent.</p> <p>The current "14 days" notice will be updated to "30 days."</p>	<p>22-2</p>

# Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2022

<p><b>Chapter 21</b> <b>Unit Transfers</b></p> <p><b>21.8 Unit Offers</b></p>	<p>Unless otherwise stated under Section 21.2, households approved for transfers will be offered a choice of up to three (3) properties with available units to meet the family’s housing need (subject to unit availability). Additional unit offers may be made to satisfy a reasonable accommodation. For mandatory transfers, refusal of a unit offer without good cause will result in lease termination. For voluntary transfers, refusal of three unit offers with or without good cause will result in removal of the household from the transfer list.</p>	<p>Language will be added to clarifying that number of offers only applies to Under-Housed/Over-Housed Families (21.2) and Special Transfers (21.3). The limit of unit offers does not apply to the Emergency Transfer Policy for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (21.7)</p> <p>ADD: The limit of unit offers does not apply to Emergency Transfer Policy for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking under Section 21.7.</p>	<p>21-3</p>
<p><b>Chapter 24</b> <b>Community Service</b></p> <p><b>24.3 Exempt Individual</b></p>	<p>Is a member of a family receiving assistance, benefits, or services under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of the state of Missouri, including a state-administered welfare-to-work program, and has not been found by the state or other administering entity to be in noncompliance with such program.</p>	<p>HUD PIH-2015-12 clarified that the Supplemental Nutrition Assistance Program (SNAP) qualifies as a welfare program of the state. Therefore, if a tenant is a member of family receiving assistance under SNAP, and has been found by the administering State to be in compliance with the program requirements, that tenant is exempt from Community Service requirements.</p> <p>Update Section: Is a member of a family receiving assistance, benefits, or services under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of the state of Missouri, including a state-administered welfare-to-work program or Supplemental Nutrition Assistance Program (SNAP) and has not been found by the state or other administering entity to be in noncompliance with such program. Supplemental Nutrition Assistance Program (SNAP) qualifies as a welfare program of the state.</p>	

# Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2022

<b>ACOP Appendix 2</b>  <b>Income Limits</b>		SEE ATTACHMENT	Appendix 2-1
<b>ACOP Appendix 3</b>  <b>Flat Rent Schedule</b>		SEE ATTACHMENT	Appendix 3-1

## St. Louis Housing Authority

## INCOME LIMITS

FY 2022 Income Limits  
Median Family Income \$97,200

No. of Persons	1	2	3	4	5	6	7	8	9	10	11	12
30% Extremely Low	\$19,950	\$22,800	\$25,650	\$28,450	\$32,470	\$37,190	\$41,910	\$46,630	\$50,360	\$54,389	\$58,740	\$63,440
50% Very Low	\$33,250	\$38,000	\$42,750	\$47,450	\$51,250	\$55,050	\$58,850	\$62,650	\$67,662	\$73,075	\$78,921	\$85,235
80% Low	\$53,150	\$60,750	\$68,350	\$75,900	\$82,000	\$88,050	\$94,150	\$100,200	\$108,216	\$116,873	\$126,223	\$136,321

NOTE: The above income limits are effective as of April 18, 2022 and subject to change as HUD generally revises these limits annually.

The latest and most recent annual income limits as established and approved by HUD shall be applicable and are automatically incorporated into and made a part of this policy as of the effective date of the newly established income limits as set forth and approved by HUD. As Income Limits are revised and modified by HUD and adopted by the SLHA Board of Commissioners through board resolution, they will be posted at each development.

Resolution No. XXXX  
Approved by the Board of Commissioners XX/XX/XXXX



**St. Louis Housing Authority**  
**FY 2022 Annual Plan**

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**ATTACHMENT #3F**

**Section B.1 (c) – PHA Plan Update – Plan Elements Revised**

**Item 2–Deconcentration and Other Policies that Govern Eligibility, Selection & Admissions**

**Administration Plan (Section 8 Housing Choice Program) - Changes  
Admissions and Continued Occupancy Policy (ACOP) – Matrix of Changes**

Flat Rent Comparables (ACOP Appendix #3) – SLHA annually revises the Flat Rent Comparables to adjust rent limits comparable to local area rents. (Attachment 5)

**REFERENCE ATTACHMENT 5**

**St. Louis Housing Authority**  
**FY 2022 Annual Plan**

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**ATTACHMENT #3G**

**Section B.1 (c) – PHA Plan Update – Plan Elements Revised**

**Item 2–Deconcentration and Other Policies that Govern Eligibility, Selection & Admissions**

**Administration Plan (Section 8/Housing Choice Voucher Program) – Matrix of Changes  
Admissions and Continued Occupancy Policy (ACOP) – Matrix of Changes**

HUD PIH Notice 2021-14 (HA) Rev-3, (ACOP Appendix #5) – COVID-19 Statutory and Regulatory Waivers.

COVID-19 Statutory and Regulatory Waivers and Alternative Requirements for the Public Housing, Housing Choice Voucher (including Mainstream and Mod Rehab), Indian Housing Block Grant and Indian Community Development Block Grant programs, Suspension of Public Housing Assessment System and Section Eight Management Assessment Program, Revision 3

The Admissions and Continued Occupancy Policy (ACOP) Matrix of revisions has been revised to incorporate the St. Louis Housing Authority COVID-19 Tracking Sheet of waivers and alternative requirements as adopted.



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

**SPECIAL ATTENTION OF:**

Office Directors of Public Housing;  
Regional Directors; Public Housing  
Agencies; Offices of Native American  
Programs; Indian Tribes, and  
Tribally Designated Housing Entities.

**NOTICE PIH 2020-33(HA), REV-2**

Issued: November 30, 2020

Expires: This Notice remains in effect  
until amended, superseded or rescinded.

Supersedes: Notices PIH 2020-05; PIH  
2020-13

Cross References: Notice PIH-2018-18;  
Notice PIH-2019-11; Notice PIH-2011-64;  
82 FR 5458 (January 18, 2017); 83 FR  
35490 (July 26, 2018); Notice PIH-2020-22;  
Notice PIH-2020-20

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**SUBJECT:** COVID-19 Statutory and Regulatory Waivers and Alternative Requirements for the Public Housing, Housing Choice Voucher (including Mainstream and Mod Rehab), Indian Housing Block Grant and Indian Community Development Block Grant programs, Suspension of Public Housing Assessment System and Section Eight Management Assessment Program, Revision 2

**1. PURPOSE**

The Coronavirus Aid, Relief and Economic Security (CARES) Act (Public Law 116-136) provides the U.S. Department of Housing and Urban Development (HUD) with broad authority to waive or establish alternative requirements for numerous statutory and regulatory requirements for the Public Housing program, Housing Choice Voucher (HCV) program, Indian Housing Block Grant (IHBG) program, and Indian Community Development Block Grant (ICDBG) program.

In Notice PIH 2020-05, published on April 10, 2020, HUD exercised its authority under the CARES Act to establish waivers and administrative flexibilities to provide relief to Public Housing Agencies (PHAs), Indian tribes, and tribally designated housing entities (TDHEs) in response to the COVID-19 pandemic. PIH subsequently published Notice PIH 2020-13, which restated the waivers and alternative requirements established previously in Notice PIH 2020-05, provided additional waivers and alternative requirements, extended the periods of availability for previously established waivers and alternative requirements, and issued technical amendments to several of the previously established waivers and alternative requirements. Additionally, HUD published Notices PIH 2020-20 and PIH 2020-22 which provided waivers and alternative requirements specific to the Section 8 Moderate

Rehabilitation (Mod Rehab) Program and Mainstream vouchers, respectively.

This Notice restates the waivers and alternative requirements included previously in Notice PIH 2020-13, carries forward information on previously specified HUD actions, adds new waivers and alternative requirements, and incorporates the waivers and alternative requirements for Mainstream vouchers and the Mod Rehab Program. In addition, this Notice extends the period of availability of certain waivers, such as those related to Income Verification and Annual Examinations, until June 30, 2021.

With respect to the Public Housing and HCV programs, use of any waiver or alternative requirement established by HUD is at the discretion of the PHA; however, HUD strongly encourages PHAs to utilize any and all waivers and alternative requirements as necessary to keep Public Housing and HCV programs operational to the extent practicable. HUD also encourages PHAs to utilize waivers and alternative requirements to expand housing assistance opportunities, including to families on waiting lists; providing affordable, safe housing during this time assists in addressing issues like homelessness and overcrowding that contribute to risk factors during the COVID-19 pandemic.

### **SUMMARY OF REVISIONS**

A list of the waivers and alternative requirements extended by this Notice from PIH 2020-13, PIH 2020-20, and PIH 2020-22 are included as an appendix. The new waivers and alternative requirements included in this Notice are summarized below.

This Notice establishes the following new waivers and alternative requirements:

- PH-13: Over-Income Limit: Termination Requirement waives the termination requirement for an over-income family and, alternatively, requires the PHA to charge the family the applicable Fair Market Rent as the family's monthly rental amount.
- PH-14: Annual Choice of Rent waives the requirement that a family may not be offered a choice between a flat rent and an income-based rent more than once a year.
- 12.d.: Section 6(j) 1- and 2-Year Substantial Improvement Requirements tolls the timing for determining substantial improvement for PHAs designated as troubled prior to the date of this Notice and that have not received a Public Housing Assessment System (PHAS) assessment for the first full fiscal year after the initial notice of the troubled designation.

This Notice also adds the following alternative requirements to previously established Housing Quality Standard (HQS) and HCV waivers. The newly added alternative requirements are effective as of the date of this Notice. If a PHA previously adopted the waivers listed below, the newly added alternative requirement will only apply to actions taken under the waivers as of the date of this Notice and the PHA must update any applicable policies accordingly.

- HQS-5: HQS Inspection Requirement: Biennial Inspections now provides the alternative requirement that, at a minimum, the PHA must require 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.
- HCV-5: Absence from Unit requires the PHA maintain documentation in the tenant file which explains the extenuating circumstances that caused the extended absence.

In addition, this Notice provides for two additional alternative requirements related to the Section 8 Management Assessment Program (SEMAP).

- 11b-1: SEMAP allows field offices to perform remote SEMAP confirmatory review instead of an on-site confirmatory review before changing any rating from troubled to standard or high performer.
- 11b-2: SEMAP waives the requirement for PHA submission of an annual SEMAP certification in the Inventory Management System–PIH Information Center (IMS-PIC) within 60 days of fiscal year end (FYE) during the timeframe HUD is rolling over prior year scores.

Finally, the regulatory authority for item 11b: SEMAP is corrected to 24 CFR § 985.105.

## **2. BACKGROUND**

An outbreak of a respiratory disease caused by a novel (new) coronavirus has as of this date been detected in over 200 countries world-wide, including in the United States. The virus has been named “severe acute respiratory syndrome coronavirus 2” (SARS-CoV-2) and the disease it causes has been named “Coronavirus Disease 2019” (“COVID-19”). On January 31, 2020, Secretary of Health and Human Services Alex M. Azar II declared a public health emergency for the United States to aid the nation’s healthcare community in responding to COVID-19. On March 13, 2020, President Donald J. Trump declared the COVID-19 pandemic a national emergency.

The Federal Government is working closely with state, local, Tribal, and territorial partners, as well as public health partners, to respond to this public health threat. While various parts of the country are experiencing different levels of COVID-19 activity all 50 states have reported cases of COVID-19 to the Centers for Disease Control and Prevention (CDC).

The COVID-19 pandemic presents significant challenges for HUD and our PHA, Tribal, and TDHE partners to continue to carry out HUD’s fundamental mission to provide decent, safe, and sanitary affordable housing for low-income families. Program operations have been severely impacted as PHAs, tribes, and TDHEs comply with critically important advisories and directives from public health professionals, including social distancing and other preventive practices that will slow the spread of COVID-19 and reduce the risk of exposure.

On March 27, 2020, President Trump signed the CARES Act into law, which authorizes over \$2 trillion in emergency assistance and health care response for individuals, families and businesses affected by the COVID-19 pandemic, and emergency appropriations to support Executive Branch agency operations during the COVID-19 pandemic. The CARES Act further provides HUD with broad authority, in the context of the COVID-19 pandemic, to waive statutes and regulations (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment) for the Public Housing and HCV programs, IHBG program, and ICDBG program. Through Notices PIH 2020-05 and PIH 2020 –13, HUD exercised this authority to provide PHAs, Indian tribes, and TDHEs with flexibility to adjust program practices where necessary to prioritize mission critical functions when normal operations are restricted and severely constrained, further prevent the spread of COVID-19, and mitigate the health risks posed by COVID-19 to PHA, Tribal, and TDHE staff, families, landlords, and their communities at large. In addition, through Notices PIH 2020-20 and PIH 2020-22, HUD provided, among other provisions, additional flexibilities

for the Mod Rehab and Mainstream parts of the HCV program.

Due to anticipated impact of COVID-19 on PHAs and assisted families over an extended period, HUD considered which flexibilities remain necessary to maintain PHA operations and which could be allowed to lapse. Through this Notice, HUD is extending the period of availability of many of these previously established waivers and alternative requirements. This Notice consolidates into a single document all previously established waivers and alternative requirements, including those not being extended at this time.

### **3. CONTINUED OPERATIONS DURING THE COVID-19 PANDEMIC**

The waivers implemented through this Notice provide administrative relief and allow for alternative approaches to various aspects of PHA, Tribal, and TDHE operations. With this flexibility, HUD strongly encourages PHAs, Indian tribes, and TDHEs to continue using available funding to house families, keep families in their homes, and conduct critical operations that can be done remotely and safely. Some critical functions for PHAs include, but are not limited to 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. Some critical functions for Indian tribes and TDHEs include but are not limited to ensuring low income Native American families remain housed, alleviating severe overcrowding, and carrying out eligible affordable housing activities.

HUD encourages PHAs, Indian tribes, and TDHEs to apply the waivers authorized in this Notice based on local circumstances and needs. HUD also encourages PHAs, Indian tribes, and TDHEs to document and expeditiously implement plans for alternative procedures in order to provide stable housing for some of our country's most vulnerable families. Alternative processes may include electronic transmission of information to families, conducting briefings online, conducting conference calls, or using self-service features on the PHA's, Indian tribe's, or TDHE's website if available, and providing business-reply envelopes or secure drop-box apparatuses for document or rent submission for assisted families that do not have access to the Internet.

PHAs and industry groups are encouraged to work together with each other and with HUD during this challenging time to share ideas on how these critical functions can continue in order to house families. Likewise, it is imperative that Indian tribes, as well as regional and national organizations representing Native American housing interests, work together and with HUD's Office of Native American Programs (ONAP) and its area offices to find and share safe and efficient methods to carry out affordable housing activities to support low-income Indian families and their health in Indian Country and across the nation.

*It is important to note that, for the Public Housing and HCV programs, HUD has not provided waiver authority that would allow tenants to stop paying their portion of the rent as determined by the PHA. Thus, it is critically important for PHAs to have revised procedures in place to allow for the timely completion of interim reexaminations for decreases in family income (see further discussion of this topic and the waiver authority/alternative requirement (PH and HCV-3) provided in Section I, paragraph 7, of this Notice).*

#### **4. WAIVER AND ALTERNATIVE REQUIREMENT AUTHORITY**

These waivers and alternative requirements are established under the authority of the CARES Act as well as Secretary Carson's finding that these waivers and alternative requirements are necessary for the safe and effective administration of the Public Housing and HCV programs, consistent with the purposes described under the CARES Act, to prevent, prepare for, and respond to COVID-19.

The Secretary may waive and/or establish alternative requirements for additional statutory and regulatory provisions in addition to these waivers by subsequent Notice.

With respect to the waivers and alternative requirements under Native American programs, such waivers and alternative requirements are also established under the authority of the CARES Act and Secretary Carson's finding that all waivers provided under this Notice are necessary to expedite or facilitate the use of Indian Housing Block Grant and Indian Community Development Block Grant funds to prevent, prepare for, and respond to the coronavirus. HUD will continue to assess the need for further waiver relief during the COVID-19 pandemic, and Indian tribes and TDHEs are encouraged to submit any additional waiver requests to their area ONAPs. HUD will consider all requests and determine whether to approve additional relief.

#### **5. WAIVER AND ALTERNATIVE REQUIREMENT APPLICABILITY**

Through this Notice HUD is making the new waivers and alternative requirements listed in this Notice effective immediately as of the date of this Notice for those PHAs that elect to adopt them. The waivers and alternative requirements previously established in Notices PIH 2020-05, PIH 2020-13, PIH 2020-20 and PIH 2020-22 remain effective as of the date of publication of those notices. PHAs may adopt the use of any of these waivers at any time during the period of availability (see Section 6 below).

With respect to the Public Housing program, the CARES Act provides that the Secretary may waive or specify alternative requirements for any provision of any statute or regulation that the Secretary administers in connection with the use of amounts made available under the CARES Act supplemental appropriation, the FY 2020 Operating Fund and Capital Fund appropriations, and any prior Operating Fund or Capital Fund appropriations. See Notice PIH 2020-07, "Implementation of Supplemental Guidance to the Federal Fiscal Year 2020 Operating Fund Appropriations," available here:

<https://www.hud.gov/sites/dfiles/PIH/documents/PIH2020-07.pdf>.

With respect to the HCV program, the CARES Act provides that the Secretary may waive or specify alternative requirements for any provision of any statute or regulation that the Secretary administers in connection with the use of amounts made available under the CARES Act supplemental appropriation or under the FY 2020 Tenant-Based Rental Assistance (TBRA) appropriation. This means the waiver/alternative requirements are applicable to the HCV program, including special purpose vouchers such as Mainstream vouchers, Family Unification Program (FUP) vouchers, and HUD-Veterans Affairs Supportive Housing (HUD-VASH) vouchers, provided that HCV program operations including those special purpose vouchers are supported by amounts provided by the FY 2020 TBRA appropriation (including FY 2020 renewal funding, FY 2020 administrative fees, and FY 2020 new special purpose voucher allocations) or amounts from the CARES Act

supplemental appropriation during the period of applicability. See Notices PIH 2020-08, (“CARES Act – HCV Program Administrative Fees”) and PIH 2020-09 (“CARES Act Mainstream Funding for Public Housing Authorities (PHAs) Awarded Funding Allocations in the 2017 and 2019 Competitions), both available here:

[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/publications/notices](https://www.hud.gov/program_offices/public_indian_housing/publications/notices).

The use of these waivers is at the discretion of the individual PHA. A PHA may choose to apply all, some, or none of the waivers to their Public Housing and HCV programs. PHAs may continue to request regulatory waivers from HUD in accordance with Notice PIH 2018-16 for waivers that are not covered by this Notice, however, the PHA may not implement those waivers until the waiver request is approved by HUD.

Some of the waivers require the use of alternative requirements. If the PHA adopts a waiver with an alternative requirement, the PHA must comply with all the terms and conditions of the alternative requirement. Please see the individual waiver descriptions for information on the applicable alternative requirements.

PHAs are required to keep written documentation that records which waivers the PHA applied to their programs(s) and the effective dates. A summary of the available waivers/alternative requirements and a suggested format for such documentation is included as Attachment I to this Notice. A PHA does not need to notify HUD or receive HUD approval to begin utilizing these waivers/alternative requirements. However, HUD may subsequently require the PHA to provide information to HUD on the waivers used by the PHA and the date the PHA applied the waiver to its program(s).

If a PHA chooses to apply any of the waivers provided for in this Notice, the PHA is required to publicly post or otherwise make available to the public a list of such waivers and alternative requirements by whatever means it considers most effective (e.g., posting to its website, posting in central and any satellite offices and properties) as soon as practicable. The PHA also is required to notify affected residents and owners of any impacts that the waiver and alternative requirement (where applicable) may have on them by whatever means it considers most effective as soon as practicable.<sup>1</sup> HUD recognizes that the COVID-19 pandemic presents unique challenges from a staffing and communication perspective and encourages PHAs to adapt their communications in consideration of local conditions and resources. For example, 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 as circumstances allow.

HUD reminds PHAs that all materials, notices, and communications to families regarding the use of the waiver authorities must be clearly communicated and provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with Section 504 of the Rehabilitation Act (Section 504) and HUD’s Section 504 regulation, and Titles II or III of the Americans with Disabilities Act (ADA) and

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<sup>1</sup> Although PHAs are required to notify all affected families and owners as soon as practicable, in the case of PH-10: Tenant Notifications for Changes to Project Rules and Regulations, PHAs are specifically required to notify affected families within 30 days of making changes to Public Housing project rules and regulations.



implementing regulations. Section 504 and the ADA require recipients to ensure effective communication with applicants, participants, and members of the public and to provide appropriate auxiliary aids and services where necessary to afford individuals with hearing, vision, and other communication-related disabilities an equal opportunity to access information. PHAs must provide appropriate auxiliary aids and services necessary to ensure effective communication in all notices and communications, which includes ensuring that information is provided in appropriate accessible formats as needed, e.g., Braille, audio, large type, assistive listening devices, and sign language interpreters, accessible websites and other electronic communications (see 24 CFR 8.6, 28 CFR 35.160, and 28 CFR 36.303).

PHAs must also continue to take reasonable steps to ensure meaningful access to their programs and activities to Limited English Proficient (LEP) individuals. As an aid to recipients, HUD published Final Guidance to Federal Financial Assistance Recipients: Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (LEP Guidance) in the Federal Register on January 22, 2007 (72 FR 2732). LEP guidance and information is available here:

<https://www.federalregister.gov/documents/2007/01/22/07-217/final-guidance-to-federal-financial-assistance-recipients-regarding-title-vi-prohibition-against>.

## **6. PERIOD OF AVAILABILITY**

With respect to the Public Housing and HCV programs, pursuant to the CARES Act, the waivers/alternative requirements established in prior notices remain effective as of the date of publication which established the waiver/alternative requirement. The new waivers/alternative requirements established in this Notice are effective for immediate use by PHAs as of the date of this Notice. The specific statute, regulation, and/or sub-regulatory guidance being waived (as applicable), the period of availability, and the alternative requirement (if applicable), are found in Section 1, paragraphs 7 through 12 of this Notice.

The period of availability for the public housing and HCV waivers is in most cases extended to June 30, 2021. Other waivers have unique dates, such as when the period of availability is dependent on a PHA's fiscal year end date or based on a specific action or activity. PHAs that adopted waivers/alternative requirements established in Notices PIH 2020-05, PIH 2020-13, PIH 2020-20, and PIH 2020-22 may continue to operate under those waivers/alternative requirements through the extended availability periods provided in this Notice.

The period of availability for these waivers/alternative requirements, collectively or individually, may be further extended by PIH Notice should HUD determine this to be necessary. PHAs are not required to keep the waiver/ alternative requirement in-place for the full period of availability (including any extension) but may at any time choose to revert to regular program requirements and operations.

With respect to Native American programs, pursuant to the CARES Act, waivers and alternative requirements provided under the IHBG program and the ICDBG program are deemed to be effective as of the date the Indian tribe or TDHE began preparing for the COVID-19 pandemic. In accordance with the Act, this waiver relief is available only for IHBG funding and ICDBG funding provided under the CARES Act, and IHBG and ICDBG funding appropriated under the FY 2020 Consolidated Appropriations Act (Public Law 116-94). Since the initial issuance of this Notice PIH 2020-05, HUD subsequently determined

that the waiver authority under the “Community Development Fund” account in the CARES Act also authorized HUD to issue waivers and alternative requirements with respect to ICDBG funding appropriated under the FY 2019 Consolidated Appropriations Act (Public Law 116-6).

The waivers and alternative requirements issued under the IHBG and ICDBG programs are generally available until funds are expended, unless otherwise noted under specific waivers below. HUD is allowing waivers and alternative requirements to remain available to Indian tribes and TDHEs until funds are expended because all funds subject to these waivers and alternative requirements must be used to prevent, prepare for, and respond to COVID-19. A summary of the waivers and alternative requirements issued under the IHBG and ICDBG programs is provided in Attachment II to this Notice.

**SECTION I: WAIVERS APPLICABLE TO THE PUBLIC HOUSING AND HCV PROGRAMS**

**7. WAIVERS APPLICABLE TO BOTH THE PUBLIC HOUSING AND HCV PROGRAMS**

**PH and HCV-1: PHA 5-Year and Annual Plan Submission Dates: Significant Amendment Requirements**

Statutory Authority: Section 5A(a)(1), Section 5A(b)(1), Section 5A(g), and Section 5A(h)(2) of the United States Housing Act of 1937 (hereafter “the USHA of 1937”)

Regulatory Authority: 24 CFR §§ 903.5(a)(3), 903.5(b)(3), 903.13(c), 903.21, 903.23

Description: For all PHAs, after submission of their first 5-Year Plan, all subsequent 5-Year Plans must be submitted once every five PHA fiscal years, no later than 75 days before the commencement of the PHA's fiscal year. Non-qualified PHAs must also submit their Annual Plan no later than 75 days before the commencement of their fiscal year. Qualified PHAs are not required to submit an annual plan to HUD but are required to hold an annual hearing to discuss proposed plans for the upcoming fiscal year, and are required to submit an annual civil rights certification.

Due to the potential postponement of public hearings due to limitations on large public gatherings, HUD is waiving these requirements, and providing alternative deadlines for some PHAs. Specifically, HUD is establishing an alternative requirement under which PHAs with 6/30/20 or 9/30/20 fiscal year-end (FYE) dates must have submitted their 5-Year (if due in 2020) and Annual Plans or civil rights certification for qualified PHAs no later than 10/18/20 (75 days before 1/1/21) and PHAs with 12/31/20 FYE dates must submit their 5-Year (if due in 2020) and annual plans no later than 1/16/21 (75 days before 4/1/21). Please see the chart below (the “Revised Submission Requirement” and “Revised Due Date” reflect the revisions from PIH 2020-13):

PHA FYE	Revised Submission Requirement	Revised Due Date
6/30/20 and 9/30/20	75 days before 1/1/21	10/18/20
12/31/20	75 days before 4/1/21	1/16/21

Unless HUD subsequently revises this waiver authority and alternative requirement, PHAs with FYE dates of 3/31 are not impacted by this waiver and are required to submit the 5-Year (if due in 2020) and Annual Plan no later than 75 days before the commencement of their fiscal years.

In addition, the statute and regulations further provide that a significant amendment or modification to the Annual Plan may not be adopted until the PHA has duly called a meeting of its board of directors (or similar governing body) and the meeting, at which the amendment or modification is adopted, is open to the public, and that notification of the amendment or modification is provided to and approved by HUD.

HUD is waiving these requirements and establishing an alternative requirement that any change to a PHA policy, except for changes related to Section 18, Section 22, or the Rental Assistance Demonstration (RAD), that would normally trigger significant amendment

requirements of the PHA Plan, may be effectuated without completing the significant amendment process. PHAs are advised that the accessibility, language access, and other nondiscrimination requirements related to the significant amendment process are not waived.

The PHA is required to notify public housing residents and HCV families of any impacts that the significant amendment may have on them by whatever means it considers most effective as soon as practicable. As noted earlier, HUD recognizes that the COVID-19 pandemic presents unique challenges from a staffing and communication perspective and encourages PHAs to adapt their communications in consideration of local conditions and resources. For example, 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 as circumstances allow. All materials, notices, and communications must be clearly communicated and provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with Section 504 of the Rehabilitation Act (Section 504) and HUD's Section 504 regulation, and Titles II or III of the Americans with Disabilities Act (ADA) and implementing regulations, and Section 508 of the Rehabilitation Act.

All materials, notices, and communications must also be provided in a manner that takes reasonable steps to ensure meaningful access by those with limited English Proficiency.

Period of Availability: The period of availability for the waiver of the significant amendment process ends on December 31, 2020. The period of availability for the 5-Year/Annual Plan submission varies depending on the end date of the PHA fiscal year. Please see the description section above.

### **PH and HCV-2: Family Income and Composition: Delayed Annual Examinations**

Statutory Authority: Section 3(a)(1) of the USHA of 1937

Regulatory Authority: 24 CFR § 982.516(a)(1) - HCV

Regulatory Authority: 24 CFR § 960.257(a) - Public Housing

Description: PHAs are required to conduct a reexamination of family income and composition at least annually. Recognizing the foreseeable difficulties in complying with this requirement in light of the COVID-19 pandemic, HUD is waiving this statutory and regulatory requirement to permit PHAs to delay annual reexaminations of HCV and public housing families. However, if the PHA delays annual reexaminations for HCV families under this authority, it must also comply with the alternative requirement regarding the application of an increase in the payment standard amount during the Housing Assistance Payment (HAP) contract term (see HCV-7 below) if applicable, so as not to delay the application of the increased payment standard amount to the family's HAP calculation.

Period of Availability: All annual reexaminations due in Calendar Year 2020 (CY20) must be completed by 12/31/20. Reexaminations due between 1/1/21 and 6/30/21 must be completed by 6/30/21.

### **PH and HCV-3: Family Income and Composition: Annual Examination; Income Verification Requirements**

Regulatory Authority: 24 CFR § 5.233(a)(2) – HCV and Public Housing

Regulatory Authority: 24 CFR § 960.259(c) – Public Housing

Regulatory Authority: 24 CFR § 982.516(a) - HCV

Sub-regulatory Guidance: Notice PIH 2018-18

Description: PHAs are required to use the Enterprise Income Verification (EIV) System for verification of family income at the annual examination. 24 CFR §960.259(c) and 24 CFR §982.516(a) require PHAs to obtain third-party verification, or document in the tenant file why third-party verification was not available, during mandatory reexaminations or recertifications of family composition and income. Further, 24 CFR §5.233(a)(2) requires PHAs to use EIV as a third-party source to verify tenant employment and income information during mandatory reexaminations or recertifications of family composition and income in accordance with §5.236 and administrative guidance issued by HUD. Notice PIH 2018-18 describes the required verification hierarchy process PHAs must follow. HUD understands that documentation may be difficult to obtain as a result of the COVID-19 pandemic and remains aware that PHAs are also facing challenges with securely accessing HUD systems while many if not all staff are working remotely.

To address these challenges, HUD is waiving the requirements to use the income hierarchy described by Notice PIH 2018-18 and will allow PHAs to forgo third-party income verification requirements for annual reexaminations, including the use of EIV, if the PHA wishes to conduct the annual recertification rather than delaying the family's annual recertification (as permitted under PH and HCV-2 above).

During the allowable period of availability, PHAs may consider self-certification as the highest form of income verification to process annual reexaminations. This may occur over the telephone (but must be documented by PHA staff with a contemporaneous written record), through an email or postal mail with a self-certification form by the tenant, or through other electronic communications. PHAs are encouraged to incorporate procedures to remind families of the obligation to provide true and complete information.

PHAs are further reminded that there is no HUD requirement that income and family composition examinations and recertifications must be conducted in-person unless determined necessary as a reasonable accommodation for a person with a disability. In such cases, PHAs may look to applicable public health guidelines and any state or local ordinance on how to maintain appropriate health precautions (e.g., social distancing).

PHAs that conduct annual examinations under this waiver/alternative requirement will be responsible for addressing any material discrepancies (i.e., unreported income or a substantial difference in reported income) that may arise later. For example, if a tenant self-certified that the tenant lost their job, but later the EIV Income Validation Tool

(IVT) shows the tenant's employment continued, the PHA must take enforcement action in accordance with their policies and procedures.<sup>2</sup>

Period of Availability: The period of availability ends on June 30, 2021.

#### **PH and HCV-4: Family Income and Composition: Interim Examinations**

Statutory Authority: Section 3(a)(1) of the USHA of 1937

Regulatory Authority: 24 CFR § 5.233(a)(2) - HCV and Public Housing

Regulatory Authority: 24 CFR § 982.516(c)(2) - HCV

Regulatory Authority: 24 CFR §§ 960.257(a), (b), and (d); 960.959(c) - Public Housing

Sub-regulatory Guidance: Notice PIH 2018-18

Description: For the HCV and Public Housing programs, PHAs are required to adopt policies (in their Administrative Plans and Admissions and Continued Occupancy Plans (ACOPs), respectively) prescribing when and under what conditions the family must report a change in family income or composition. However, at any time that a family requests an interim determination of family income or composition because of any changes since the last determination, the PHA must make the interim determination within a reasonable time after the family's request. In most cases, the reason a family requests an interim determination is due to a loss in income or a change in family composition.

PHAs are required to use EIV for verification of family income at interim reexamination. 24 CFR §960.259(c) and 24 CFR §982.516(a) require PHAs to obtain third-party verification, or document in the tenant file why third-party verification was not available, during mandatory reexaminations or recertifications of family composition and income. 24 CFR § 5.233(a)(2) requires PHAs to use EIV as a third-party source to verify tenant employment and income information during mandatory reexaminations or recertifications of family composition and income in accordance with §5.236 and administrative guidance issued by HUD. Notice PIH 2018-18 further describes the required verification hierarchy process PHAs must follow.

To assist PHAs that may be prioritizing the processing of interim reexaminations due to decreases in family income and mitigate the challenges of transferring documentation during periods of shelter-in-place/stay-at-home efforts in response to the COVID-19 pandemic, HUD is waiving the requirements to use the income verification hierarchy as described by Notice PIH 2018-18. HUD will allow PHAs to forgo third-party income verification requirements for interim reexaminations, including the required use of EIV. During the allowable period of eligibility, PHAs may consider self-certification as the highest form of income verification to process interim reexaminations. This may occur over the telephone

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<sup>2</sup> Consistent with Section 15 of Notice PIH 2018-18, if the EIV Income or IVT Report reveal an income source that was not reported by the tenant or a substantial difference in the reported income information, the PHA is required to take specific actions which may include determining any retroactive rent due. PHAs may consider adding such a reminder to families in any self-certification forms.

(with a contemporaneous written record by the PHA staff person), through an email with a self-certification form by the family, or through other electronic communications.

As noted in the previous waiver description, there is no HUD requirement that income and family composition examinations and recertifications must be conducted in-person unless it may be necessary as a reasonable accommodation for a person with a disability. In such cases, PHAs may look to applicable public health guidelines and any state or local ordinance on how to maintain appropriate health precautions (e.g., social distancing).

PHAs that conduct interim reexaminations under this waiver/alternative requirement will be responsible for addressing any material discrepancies (i.e., unreported income or a substantial difference in reported income) that may arise later. For example, if a tenant self-certified that the tenant lost their job, but later the EIV IVT Report shows the tenant's employment continued, the PHA must take enforcement action that is consistent with its policies and procedures.<sup>3</sup>

PHAs may wish to review and adjust their interim reexamination policies (e.g., revising the PHA requirements when families must report increases in income between annual reexaminations or revising the policy regarding how to determine the effective date of an interim examination). PHAs should see HCV-1 and PH-4 for information on how these types of changes can be expedited.

Period of Availability: The period of availability ends on June 30, 2021.

### **PH and HCV-5: Enterprise Income Verification (EIV) Monitoring**

Regulatory Authority: 24 CFR § 5.233 – Public Housing and HCV

Sub-regulatory Guidance: Notice PIH 2018-18

Description: Notice PIH 2018-18 specifies the required monitoring of EIV reports. For example, PHAs are required to monitor the Deceased Tenants Report, the Identity Verification Report, the Immigration Report, the IVT Report, and the Multiple Subsidy Report and the New Hires Report on a monthly basis. Recognizing the challenges PHAs are facing with many if not all staff working remotely, HUD is waiving the mandatory EIV monitoring requirements. PHAs are reminded that EIV data is overwritten; monthly or quarterly reports must be downloaded to preserve the data for a particular month or quarter.

Period of Availability: The period of availability ends on June 30, 2021.

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<sup>3</sup> Consistent with Section 15 of Notice PIH 2018-18, if the EIV Income or IVT Report reveal an income source that was not reported by the tenant or a substantial difference in the reported income information, the PHA is required to take specific actions which may include determining any retroactive rent due. PHAs may consider adding such a reminder to families in any self-certification forms.

**PH and HCV-6: Family Self-Sufficiency (FSS) Contract of Participation: Contract Extension**

Regulatory Authority: 24 CFR § 984.303(d)

Description: Part 984 establishes the requirements for the Section 8 and Public Housing FSS program. Section 984.303(d) authorizes a PHA to extend a family’s contract of participation for a period not to exceed two years upon a finding of good cause. HUD has made a determination that the circumstances surrounding COVID-19 qualify as “good cause” to extend family contracts, and FSS programs may consider this expanded definition of “good cause” as they make their determinations on each family’s eligibility for an extension.

Period of Availability: The period of availability during which the PHA may extend the family’s contract of participation using COVID-19 as the “good cause” ends on June 30, 2021.

**PH and HCV-7: Waiting List: Opening and Closing; Public Notice**

Regulatory Authority: 24 CFR § 982.206(a)(2)

Sub-regulatory Guidance: Notice PIH 2012-34

Description: The HCV program regulations require that when a PHA opens its waiting list, the PHA must give public notice by publication in a local newspaper of general circulation and also by minority media and other suitable means; these same practices are strongly encouraged in the Public Housing program. Recognizing the foreseeable difficulties in complying with this requirement in light of the COVID-19 pandemic, HUD is waiving this requirement and is providing an alternative requirement that the PHA may provide public notice in a voicemail message on its main or general information telephone number and through its website (if such a PHA website is available). PHAs must comply with applicable fair housing and other civil rights requirements when they provide public notice under this alternative requirement, including ensuring effective communication with persons with hearing, visual, and other communication-related disabilities. PHAs must ensure effective communication with persons with disabilities in all notifications and communications. For example, a PHA that chooses to provide public notice through a voice-mail message must ensure the notice is accessible for persons with hearing impairments, which may include also distributing the notice by email and public postings on websites. PHAs must ensure that their website is in compliance with Section 508 of the Rehabilitation Act. The voice-mail notice also must comply with all other applicable civil rights requirements, including ensuring meaningful access for persons with limited English proficiency. See 24 CFR 5.105(a) (“Nondiscrimination and Equal Opportunity”).

Period of Availability: The period of availability ends on June 30, 2021.



## **8. HOUSING CHOICE VOUCHER PROGRAM WAIVERS – HOUSING QUALITY STANDARDS (HQS) INSPECTIONS**

Introduction: HUD recognizes the unprecedented challenge the COVID-19 pandemic poses to PHAs in carrying out the most essential of their HCV program administrative responsibilities – ensuring that assisted families are living in decent, safe, and sanitary housing. HQS inspections protect the health and safety of HCV families. However, conducting physical inspections of units in many communities during the COVID-19 pandemic poses its own health risks for families, participating owners, and PHA personnel, and may run counter to public health orders, directives, or recommendations such as shelter-in-place or other social distancing practices designed to contain and reduce exposure to COVID-19. In order to provide PHAs with the necessary flexibilities to continue to allow families to lease units and to postpone normally required HQS inspections for units under HAP contract, HUD is authorizing the use of the HQS-related waivers and alternative requirements listed in this section. PHAs are in the best position to determine which (if any) of these waivers should be applied to their HCV programs based on the needs and current conditions in their local communities.

PHAs that delay inspections under these waivers must inspect the units as soon as reasonably possible when it is again safe to do so, but must complete all delayed unit inspections no later than the date specified in this Notice (or subsequent extensions provided by HUD). HUD has established relatively short periods of availability for these HQS waivers given the health and safety nature of these requirements. However, HUD will consider extending these HQS waivers and alternative requirements if HUD determines an extension is necessary.

A PHA that applies any of these waivers to its HCV program retains the right to conduct an HQS inspection on any assisted unit at any time. The PHA must grant the reasonable accommodation requests of tenants with disabilities related to HQS inspections. For example, a tenant with a respiratory disability may ask that an HQS inspection be delayed in light of COVID-19 or that the inspectors wear masks and gloves and maintain a six foot distance when entering their unit. Likewise, the PHA may always choose to conduct an initial inspection on a unit a family wishes to lease if such an inspection is determined to be warranted by the PHA, regardless of whether the PHA chooses to apply the initial HQS inspection waivers to its HCV program. Crucially, use of any of these waivers by the PHA does not relieve owners of their responsibility to maintain the unit in accordance with HQS as required in the HAP contract, nor does it in any way restrict the PHA from taking action to enforce the owner's obligations. Furthermore, use of any of these waivers by the PHA does not create any right in any third party (such as with the assisted family) to require enforcement of the HQS requirements by HUD or the PHA, or to assert any claim against HUD or the PHA, for damages, injunction or other relief, for alleged failure to enforce the HQS (see § 982.407).

### **HQS-1: Initial Inspection Requirements**

Statutory Authority: Section 8(o)(8)(A)(i), Section 8(o)(8)(C) of the USHA of 1937

Regulatory Authority: 24 CFR §§ 982.305(a), 982.305(b), 982.405

Description: Section 8(o)(8)(A)(i) requires that the PHA must inspect the unit before any assistance payment is made to determine whether the unit meets HQS. Section 8(o)(8)(C) requires the PHA to conduct the initial inspection within certain time frames after receiving the RFTA. Section 982.305 provides that the PHA may not approve the assisted tenancy or execute a HAP contract until the unit has been inspected by the PHA and passes HQS. Additionally, Section 982.305 requires that the PHA must inspect the unit to determine that the unit satisfies the HQS before the beginning of the initial lease term, and that the PHA must perform this inspection within either 15 days or within a reasonable time depending on the size of the PHA.

HUD is waiving these requirements and providing an alternative requirement. In order to place the unit under HAP contract and commence making payments, the PHA 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 instead of conducting an initial inspection. At minimum, the PHA must require this owner certification. However, the PHA may add other requirements or conditions in addition to the owner's certification but is not required to do so. The PHA is required to conduct an HQS inspection on the unit as soon as reasonably possible but no later than the 1-year anniversary date of the owner's certification.

This waiver and alternative requirement may also be applied to PHA-owned units if the independent entity is unable to perform the inspection.

Period of Availability: The period of availability for a PHA to accept an owner's self-certification for an initial inspection ends on June 30, 2021. For any unit for which a PHA accepted an owner's self-certification, the PHA must conduct an HQS inspection as soon as reasonably possible but no later than the 1-year anniversary of the date of the owner's certification.

### **HQS-2: Project-Based Voucher (PBV) Pre-HAP Contract Inspections: PHA Acceptance of Completed Units**

Statutory Authority: Section 8(o)(8)(A) of the USHA of 1937

Regulatory Authority: 24 CFR §§ 983.103(b), 983.156(a)(1)

Description: The statute and regulations at § 983.103(b) provide that the PHA must inspect each contract unit before execution of the HAP contract and that the HAP contract may not be executed until the units fully comply with HQS. For rehabilitated and newly constructed units, § 983.156(a)(1) further provides that the PHA must inspect the units to determine if the housing has been completed in accordance with the Agreement to Enter into the HAP Contract (AHAP), including compliance with the HQS and any additional requirement imposed by the PHA under the Agreement.

HUD is waiving the HQS inspection requirement and establishing an alternative requirement. Instead of conducting the pre-HAP contract HQS inspection, the PHA 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. However, the PHA may add other requirements or conditions in addition to the owner's certification but is not required to do so. The PHA is required to conduct an HQS inspection on the unit as soon as reasonably possible but no later than the 1-year anniversary date of the owner's certification.

If the PHA has imposed an additional requirement under the AHAP for newly constructed or rehabilitated projects, the PHA may choose to allow the owner to certify that the PHA requirement has been met instead of inspecting the housing to make that determination.

This waiver and alternative requirement may also be applied to PHA-owned units if the independent entity is unable to perform the inspection.

Period of Availability: The period of availability for PHAs to accept owner's self-certification for the pre-HAP inspection/completion of work requirement ends on June 30, 2021. For any unit for which a PHA accepted an owner's self-certification, the PHA must conduct an HQS inspection as soon as reasonably possible but no later than the 1-year anniversary of the date of the owner's certification.

### **HQS-3: Initial Inspection: Non-Life-Threatening Deficiencies (NLT) Option**

Statutory Authority: Section 8(o)(8)(A)(ii) of the USHA of 1937

Regulatory Authority: Housing Opportunity Through Modernization Act (HOTMA) of 2016: Implementation of Various Section 8 Voucher Provisions, 82 Fed. Reg. 5458 (published January 18, 2017)

Description: Section 8(o)(8)(A)(ii) provides the PHA with the option to choose to approve an assisted tenancy, execute the HAP contract, and begin making housing assistance payments on a unit that fails the initial HQS inspection, provided the unit's failure to meet HQS is the result only of NLT conditions. The statute further requires that the PHA must withhold housing assistance payments from the owner if the NLT conditions are not corrected within 30 days.

HUD is waiving the requirement that the PHA must withhold the payment if the NLT repairs are not made in 30 days. Instead, the PHA may provide an extension of up to an additional 30 days to the owner to make the NLT repairs and continue to make payments to the owner during the period of that maximum 30-day extension. If the owner has not made the NLT repairs by the end of the PHA extension period, the PHA must withhold payments.

This NLT initial inspection option is available to the PHA for both tenant-based units and project-based units. This waiver and alternative requirement may also be applied to PHA-owned units if the independent entity is unable to perform the inspection.

Period of Availability: The period of availability for the PHA to approve an extension of up to an additional 30 days ends on June 30, 2021. The extension to make the NLT repairs may extend beyond June 30, 2021, depending on the date the PHA approved the extension. For example, if the PHA approved the extension on June 15, 2021, the maximum extension provided to the owner would be July 15, 2021.

#### **HQS-4: HQS Initial Inspection Requirement: Alternative Inspection Option**

Statutory Authority: Section 8(o)(8)(A)(iii) of the USHA of 1937

Regulatory Authority: Housing Opportunity Through Modernization Act of 2016: Implementation of Various Section 8 Voucher Provisions, 82 Fed. Reg. 5458 (published January 18, 2017)

Description: Section 8(o)(8)(A)(iii) provides the PHA with the option to authorize occupancy of a unit prior to the initial inspection being completed if the unit had in the previous 24 months passed an alternative inspection. Under the statute the PHA may then make assistance payments retroactive to the beginning of the lease term once the unit had been determined to meet HQS pursuant to the PHA's inspection. The HOTMA HCV Federal Register Notice that implemented this statutory option further provided that the PHA must inspect the unit within 15 days of the RFTA.

HUD is waiving the requirement that the PHA must conduct its own inspection of the unit in order to commence making assistance payments under the Initial Inspection – Alternative Inspection option. Under this waiver and alternative requirement, the PHA may commence assistance payments at the beginning of the lease term based on the alternative inspection and 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 this owner certification. The PHA may add other requirements or conditions in addition to the owner's certification but is not required to do so. The PHA must conduct the HQS inspection for the unit for which it has commenced assistance payments under this waiver authority as soon as reasonably possible but no later than the 1-year anniversary date of the owner's certification.

This initial inspection option is available to the PHA for both tenant-based units and project-based units.

This waiver and alternative requirement may also be applied to PHA-owned units if the independent entity is unable to perform the inspection.

Period of Availability: The period of availability for the waiver to place a unit under HAP contract and commence payments ends on June 30, 2021. For any unit for which a PHA entered into a HAP contract and commenced payment pursuant to this alternative requirement, the PHA must conduct an HQS inspection as soon as reasonably possible but no later than the 1-year anniversary of the date of the owner's certification.

#### **HQS-5: HQS Inspection Requirement: Biennial Inspections**

Statutory Authority: Section 8(o)(D) of the USHA of 1937

Regulatory Authority: 24 CFR §§ 982.405(a), 983.103(d)

Description: The statute and the regulations require the PHA to inspect the unit not less often than biennially during the term of the HAP contract. Per the recent Federal Register Notice, 85 Fed. Reg. 11381 (Feb. 27, 2020), small rural PHAs may instead inspect the unit not less often than triennially, but since small rural PHAs do not have the authority to begin using a three-year inspection interval until after the next scheduled inspection after Feb. 27, 2020, is

carried out, the majority of small rural PHAs have not yet moved from a biennial to a triennial requirement. HUD is waiving this requirement and providing an alternative requirement. Under this waiver authority, PHAs may delay biennial inspections for both tenant-based and PBV units and instead, the PHA 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 this owner certification. However, the PHA may add other requirements or conditions in addition to the owner's certification but is not required to do so.

This waiver and alternative requirement may also be applied to PHA-owned units if the independent entity is unable to perform the inspection.

Period of Availability: The PHA must resume biennial inspections by June 30, 2021 and must conduct all delayed biennial inspections no later than December 31, 2021.

### **HQS-6: HQS Interim Inspections**

Statutory Authority: Section 8(o)(8)(F) of the USHA of 1937

Regulatory Authority: 24 CFR §§ 982.405(g), 983.103(e)

Description: The statute requires that upon notification to the PHA by a family or government official that the assisted unit does not comply with the HQS, the PHA must inspect the unit within 24 hours of when the PHA received the notification if the condition is life-threatening. 24 CFR 982.405(g) provides that if the reported condition is not life-threatening, the PHA must inspect the unit within 15 days. The regulation further provides that in the event of extraordinary circumstances HUD may waive the 24-hour or the 15-day inspection requirement until such time as an inspection is feasible.

HUD is waiving these requirements and establishing an alternative requirement for both tenant-based and PBV units. If the reported deficiency is life-threatening, the PHA must notify the owner of the reported life-threatening deficiency and that the owner must either correct the life-threatening deficiency within 24 hours of the PHA notification or provide documentation (e.g., text or email a photo to the PHA) that the reported deficiency does not exist. In the case of a reported non-life-threatening deficiency, the PHA must notify the owner of the reported deficiency within 30 days and the owner must either make the repair or document that the deficiency does not exist within 30 days of the PHA notification or any approved PHA extension. The PHA may add other requirements or conditions in addition to the owner's documentation but is not required to do so.

As is the case under the current HCV program requirements, the PHA is not required to conduct an on-site inspection to verify the repairs have been made but may rely on alternative verification methods (e.g., photos submitted by the owner, tenant certification, etc.).

This waiver may also be applied to PHA-owned units if the independent entity is unable to perform the inspection.

Period of Availability: The period of availability ends on June 30, 2021. After June 30, 2021, the PHA must conduct the HQS inspection in accordance with the applicable time

periods upon notification by a family or government official that the assisted unit does not comply with the HQS.

### **HQS-7: PBV Turnover Unit Inspections**

Regulatory Authority: 24 CFR § 983.103(c)

Description: The regulation requires that before providing assistance to a new family in a PBV contract unit, the PHA must inspect the unit. HUD is waiving this regulatory requirement and providing as an alternative requirement the PHA 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 to allow a new family to occupy the vacated PBV unit. At minimum the PHA must require this owner certification. However, the PHA may add other requirements or conditions in addition to the owner's certification but is not required to do so. The PHA is required to conduct the HQS inspection on the unit as soon as reasonably possible, but no later than the 1-year anniversary date of the owner's certification.

This waiver may also be applied to PHA-owned units if the independent entity is unable to perform the inspection.

Period of Availability: The period of availability to fill a turnover PBV unit without conducting an HQS inspection ends on June 30, 2021. For any unit for which a PHA accepted an owner's self-certification, the PHA must conduct an HQS inspection as soon as reasonably possible but no later than the 1-year anniversary of the date of the owner's certification.

### **HQS-8: PBV HAP Contract: HQS Inspections to Add or Substitute Units**

Statutory Authority: Section 8(o)(8)(A) of the USHA of 1937

Regulatory Authority: 24 CFR §§ 983.207(a), 983.207(b)

Sub-regulatory Guidance: Housing Opportunity Through Modernization Act of 2016: Implementation of Various Section 8 Voucher Provisions (82 Federal Register 5458, Jan. 18, 2017)

Description: At the discretion of the PHA and subject to all PBV requirements (including the program cap and income-mixing requirements), the PHA may amend the HAP contract to add additional PBV contract units or to substitute a different unit for a previously covered contract unit. The PBV requirements include inspecting the proposed substitute or additional unit to determine that the unit meets HQS before it may be added to the HAP contract.

HUD is waiving the HQS inspection requirement. In order to substitute or add a new unit to the PBV HAP contract, the PHA 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 instead of conducting an initial inspection. At minimum, the PHA must require the owner's certification. However, the PHA may add other requirements or conditions in addition to the owner's certification but is not required to do so.

This waiver may also be applied to PHA-owned units if the independent entity is unable to

perform the inspection.

Period of Availability: The period of availability for PHAs to accept owner's self-certification for an initial inspection ends on June 30, 2021. For any unit added to a PBV HAP contract based upon an owner's self-certification, the PHA must conduct an HQS inspection as soon as reasonably possible but no later than the 1-year anniversary of the date of the owner's certification.

### **HQS-9: HQS Quality Control Inspections**

Regulatory Authority: 24 CFR § 982.405(b), 983.103(e)(3)

Description: The regulations require PHAs to conduct supervisory quality control inspections of a sampling of units under contract. HUD is waiving this regulatory requirement.

Period of Availability: The period of applicability ends on June 30, 2021.

### **HQS-10: Housing Quality Standards: Space and Security**

Regulatory Authority: § 982.401(d)

Description: The regulation establishes a minimum standard for adequate space for both an HCV- and PBV-assisted family. Specifically, it requires that each dwelling unit have at least 1 bedroom or living/sleeping room for each 2 persons. HUD is waiving this requirement for PHAs where the PHA wishes to assist a current participant that needs to add a member or members to the assisted household as a result of the COVID-19 pandemic, 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. A participant must not enter into a new lease for a unit that does not comply with the space and security standards.

Period of Availability: For any family occupying a unit that does not meet the space and security requirements pursuant to this waiver, the waiver will be in effect for the duration of the current lease term or one year from the date of this Notice, whichever period of time is longer.

### **HQS-11: Homeownership Option: Initial HQS Inspection**

Statutory Authority: Section 8(o)(8)(A)(i), Section 8(y)(3)(B) of the USHA of 1937

Regulatory Authority: 24 CFR § 982.631(a)

Description: The statute provides that HQS re-inspections are not required for homeownership vouchers but does not exempt the unit from the initial HQS inspection. The regulation provides that the PHA may not commence monthly homeownership assistance payments until the PHA has inspected the unit and determined that the unit passes HQS. HUD is waiving this requirement. However, the family is still required to obtain an independent professional inspector in accordance with § 982.631(b)(1) and the PHA is still required to review the independent inspection and has discretion to disapprove the unit for assistance under the homeownership option because of information in the inspection report in

accordance with § 982.631(b)(4).

Period of Availability: The period of availability ends on June 30, 2021.

## **9. HOUSING CHOICE VOUCHER PROGRAM WAIVERS: GENERAL**

### **HCV-1: Administrative Plan**

Regulatory Authority: 24 CFR § 982.54(a)

Description: The regulation requires that any revisions of the PHA's administrative plan must be formally adopted by the PHA Board of Commissioners or other authorized PHA officials. Recognizing the likely foreseeable difficulties in complying with this requirement in light of the COVID-19 pandemic, HUD is waiving the requirement to allow the PHA administrative plan to be revised on a temporary basis without Board approval through March 31, 2021. Any informally adopted revisions under this waiver authority must be formally adopted no later than June 30, 2021.

Period of Availability: The period of availability to informally adopt changes to the PHA administrative plan ends on March 31, 2021; the PHA must formally adopt such revisions no later than June 30, 2021.

### **HCV-2: Information When Family is Selected: PHA Oral Briefing**

Regulatory Authority: 24 CFR § 982.301(a)(1), § 983.252(a)

Description: The regulation requires when the PHA selects a family to participate in either the HCV or PBV program, the PHA must give the family an oral briefing. HUD is waiving this requirement and as an alternative requirement allowing the PHA to conduct the briefing by other means such as a webcast, video call, or expanded information packet. Section 504 and the ADA require PHAs to ensure effective communication with applicants, participants and members of the public in all communications and notices. The PHA must ensure that the method of communication for the briefing effectively communicates with, and allows for equal participation of, each family member, including those with vision, hearing, and other communication-related disabilities, and ensures meaningful access for persons with limited English proficiency.

Period of Availability: The period of availability ends on June 30, 2021.

### **HCV-3: Term of Voucher: Extensions of Term**

Regulatory Authority: 24 CFR § 982.303(b)(1)

Description: The regulation provides that at its discretion, the PHA may grant a family one or more extensions of the initial voucher term in accordance with the PHA policy as described in the PHA administrative plan. HUD is waiving the requirement that the extension(s) must be accordance with the PHA's administrative plan in order to allow the PHA to provide extensions even though it has been unable to formally amend its policy in the administrative plan.



Period of Availability: The period of availability ends on June 30, 2021.

#### **HCV-4: PHA Approval of Assisted Tenancy: When HAP Contract is Executed**

Regulatory Authority: 24 CFR § 982.305(c)

Description: The PHA may not make any housing assistance payments to the owner until the HAP contract is executed. The regulation provides that PHA must use best efforts to execute the HAP contract before the beginning of the lease term and that the HAP contract must be executed no later than 60 days from the beginning of the lease term. Any HAP contract executed after the 60-day period is void and the PHA may not pay any housing assistance payments to the owner. HUD is waiving the regulatory requirement to allow PHAs to execute the HAP contract after the 60-day deadline has passed and make housing assistance payments back to the beginning of the lease term. However, the PHA and owner must execute the HAP contract no later than 120 days from the beginning of the lease term.

Period of Availability: The period of availability to execute the HAP contract after the normally 60-day period from the beginning of the lease term ends on June 30, 2021.

#### **HCV-5: Absence from Unit**

Regulatory Authority: 24 CFR § 982.312

Description: The regulation requires that a family may not be absent from the unit for a period of more than 180 consecutive calendar days for any reason. HUD is waiving this regulatory requirement to allow the PHA at its discretion to continue housing assistance payments and not terminate the HAP contract due to extenuating circumstances (e.g., hospitalization, extended stays at nursing homes, caring for family members). The PHA must maintain documentation in the tenant file which explains the extenuating circumstances that caused the extended absence.

Period of Availability: The period of availability for the PHA to choose to continue making HAP payments despite the family's absence of more than 180 consecutive days ends on June 30, 2021. The PHA may not make payments beyond June 30, 2021, and the HAP contract will terminate on that date if the family is still absent from the unit.

#### **HCV-6: Automatic Termination of HAP Contract**

Regulatory Authority: 24 CFR § 982.455

Description: When an HCV family's income increases to the extent that the housing assistance payment is reduced to \$0, PHAs are required to terminate HAP contracts 180 days after the last housing assistance payment to the owner. In recognition that the COVID-19 pandemic is creating economic and employment instability for many families, as well as situations where families may on a temporary basis be adding members whose additional income may result in a \$0 HAP subsidy calculation, HUD is waiving this requirement. As an alternative requirement, the PHA, upon written notice to the owner and family, may extend the period of time following the last payment to the owner that triggers the automatic

termination of the HAP contract. The extension beyond the normally applicable 180 days is determined by the PHA but may not extend beyond June 30, 2021.

Period of Availability: The period of availability for the extension ends June 30, 2021. The PHA may not extend the HAP contract beyond June 30, 2021.

### **HCV-7: Increase in Payment Standard During HAP Contract Term**

Regulatory Authority: 24 CFR § 982.505(c)(4)

Description: The regulation requires that if the payment standard amount is increased during the term of the HAP contract, the increased payment standard amount shall be used to calculate the monthly housing assistance payment for the family beginning at the effective date of the family's first regular reexamination on or after the effective date of the increase in the payment standard amount.

HUD is waiving this requirement and as an alternative requirement allowing the PHAs to apply the increased payment standard at any time (e.g., interim reexamination, owner rent increase) after the effective date of the increase in the payment standard amount, provided the increased payment standard is used to calculate the HAP no later than the effective date of the family's first regular reexamination following the change.

Note that if the PHA has delayed the family's annual recertification under the waiver authority described earlier in this Notice (see PH and HCV-2), the PHA must use the increased payment standard amount to calculate the family's HAP beginning the date that the family's first regular examination would have been effective in the absence of the waiver. Alternatively, the PHA may conduct an interim reexamination where the only change is the increased payment standard amount. Regardless of the method used, the participant must receive the increased payment standard no later than the effective date of the family's first regular reexamination following the increased payment standard.

Period of Availability: The waiver period of availability ends on June 30, 2021.

### **HCV-8: Utility Allowance Schedule: Required Review and Revision**

Regulatory Authority: 24 CFR § 982.517

Description: The regulations require the PHA to review its schedule of utility allowances each year and revise its allowance for a utility category if there has been a change of 10 percent or more in the utility rate since the last time the utility allowance schedule was revised. HUD is waiving this requirement to allow PHAs to delay the review and update of utility allowances.

Period of Availability: Any review and update of utility allowances that were due at some point in time in CY 2020 must be completed no later than June 30, 2021.

### **HCV-9: Homeownership Option: Homeownership Counseling**

Statutory Authority: Section 8(y)(1)(D) of the USHA of 1937

Regulatory Authority: 24 CFR §§ 982.630, 982.636(d)

Description: The statute requires that to be eligible for voucher homeownership assistance the family must participate in a homeownership and housing counseling program provided by the agency. The regulations at § 982.630 provide that before commencement of homeownership assistance for a family, the family must attend and satisfactorily complete the pre-assistance homeownership and housing counseling program required by the PHA. The regulations at § 982.636(d) provide that a family determined eligible for homeownership is moving under portability may purchase a unit if the receiving PHA is administering a voucher homeownership program and is accepting new homeownership families. However, the family must attend the briefing and counseling sessions required by the receiving PHA.

While HUD encourages families to continue to complete briefing and counseling sessions that are operational and can be accomplished in accordance with social distancing directives, HUD is waiving these requirements to allow the PHA to permit the family to purchase the home without fulfilling the normally applicable pre-assistance homeownership counseling requirements.

Period of Availability: The period of availability ends on June 30, 2021.

### **HCV-10: Family Unification Program: FUP Youth Age Eligibility to Enter HAP Contract**

Statutory Authority: Section 8(x)(2) of the USHA of 1937

Description: The statute provides that a FUP youth must be not more than 24 years of age (not yet reached their 25<sup>th</sup> birthday) to be eligible to be placed under HAP contract. A FUP youth issued a voucher at 24 years of age may not be able to lease the voucher before their 25<sup>th</sup> birthday where PHA operations may have been shut down or severely curtailed, unit searches are not possible due to shelter-in-place orders, or where the movement of people is significantly restricted.

HUD is waiving this requirement and providing as an alternative requirement that the PHA may execute a HAP contract on behalf of any otherwise eligible FUP youth not more than 25 years of age (not yet reached their 26<sup>th</sup> birthday). This waiver may also be applied to the Foster Youth to Independence (FYI) initiative.

Period of Availability: The period of availability ends on June 30, 2021.

### **HCV-11: Family Unification Program: Length of Assistance for Youth**

Statutory Authority: 42 U.S.C. 1437f(x)(2)

Description: The statute limits the availability of assistance to a period “not to exceed 36 months.” COVID-19 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 June 30, 2021, 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 June 30, 2021. This waiver does not apply to the FYI initiative as no participant in FYI will have received 36 months of assistance during the period of availability.

Period of Availability: The period of availability to grant the extension ends on June 30, 2021.

### **HCV-12: Family Unification Program: Timeframe for Referral**

Statutory Authority: 42 U.S.C. 1437f(x)(2)

Description: The statute provides that assistance may be provided on behalf of “otherwise eligible youths who have attained at least 18 years of age and not more than 24 years of age and 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 may also be applied to the FYI initiative.

Period of Availability: Through June 30, 2021, a PHA may receive referrals of otherwise eligible youth who will leave foster care within 120 days.

### **HCV-13: Homeownership: Maximum Term of Assistance**

Regulatory Authority: 24 CFR §982.634(a)

Description: The regulation establishes a maximum term on homeownership assistance for non-elderly/non-disabled families of 15 years if the initial mortgage has a term of 20 or more years, and 10 years in all other cases. HUD is waiving this term. Specifically, for any family that is in the last year of this term (i.e., the 15th year or the 10th year, as applicable) and that is experiencing financial hardship as a result of the COVID-19 pandemic, a PHA may provide homeownership assistance for up to 1 additional year.

Period of Availability: Through June 30, 2021, a PHA may extend homeownership assistance for up to 1 additional year.

### **HCV-14: Mandatory Removal of Unit from PBV HAP Contract**

Regulatory Authority: 24 CFR §983.211(a); §983.258

Description: Under the PBV program, a PHA is required to remove a unit from a PBV HAP contract after 180 days of zero housing assistance payments to the unit owner on behalf of the family residing in the unit. This situation arises when the family increases its income to such an extent that it no longer requires housing assistance. In recognition that the COVID-19 pandemic is creating uncertainty for owners and families, HUD is waiving this requirement. As an alternative requirement, HUD is authorizing a PHA at its discretion to keep such units under contract for a period of time that exceeds 180 days but does not extend beyond June 30, 2021. Similarly, with respect to 24 C.F.R §983.258, HUD is providing that a PHA that adopts the alternative requirement may resume housing assistance payments on behalf of a family residing in such a unit should the family's income change at any point during the period of time covered by the extension.

Period of Availability: The period of availability for the extension ends on June 30, 2021.

## **10. PUBLIC HOUSING PROGRAM WAIVERS**

### **PH-1: Fiscal Closeout of Capital Grant Funds**

Regulatory Authority: 24 CFR § 905.322(b)

Description: Section 905.322(b) establishes deadlines for the submission of an Actual Development Cost Certificate (ADCC) and an Actual Modernization Cost Certificate (AMCC) (two financial reporting documents required to close out Capital Fund grants). Specifically, the ADCC must be submitted 12 months from the date of completion or HUD termination of a development activity, and the AMCC must be submitted not later than 12 months from the activity's expenditure deadline. HUD is waiving this requirement and extending the deadlines for an ADCC or AMCC that fell between March 1, 2020, and September 30, 2020, by 6 months.

Period of Availability: For ADCC and AMCC forms due between March 1 and September 30, 2020, the deadline for submission is extended by 6 months.

### **PH-2: Total Development Costs**

Regulatory Authority: 24 CFR § 905.314(c) - (d)

Description: The public housing regulations establish a Maximum Project Cost which represents the total amount of public housing funds that may be used for development of a public housing project. The Total Development Cost (TDC) and Housing Construction Cost (HCC) limits are published periodically by HUD. These limits may not be exceeded without a waiver approved by HUD or an exception approved by HUD pursuant to 24 CFR § 905.314(c).

HUD is waiving the TDC and HCC limits to allow the amount of public housing funds committed to development of a project to exceed the applicable TDC and HCC limits by 25 percent without a waiver from HUD. Amounts in excess of 25 percent up to 50 percent may

be approved by the HUD program office on a case-by-case basis, if sufficient justification is provided. This waiver applies to public housing development, Mixed-Finance development and Choice Neighborhoods development. However, all other requirements of development set forth in 24 CFR § 905.600 still apply. HUD recognizes that COVID-19 may seriously impact development costs. The lack of available labor; shortage of materials; extended development timeframes; and changes in financial markets, all have the potential to increase development costs above the established HUD TDC and HCC limits.

If a project still exceeds TDC and HCC limits after the increase approved by HUD is taken into consideration, then a PHA may submit a request for an exception pursuant to 24 CFR § 905.314(c) or request a waiver for other good cause for HUD's consideration.

Period of Availability: A complete Development Proposal must be submitted to HUD no later than December 31, 2021, for a project to be eligible for this waiver.

### **PH-3: Cost and Other Limitations: Types of Labor**

Regulatory Authority: 24 CFR § 905.314(j)

Description: This regulation establishes that non-high performer PHAs may use force account labor for modernization activities only when the use of force account labor for such activities has been included in a Capital Fund Program 5-Year Action Plan that is approved by the PHA Board of Commissioners and HUD. HUD will waive this requirement to allow for the use of force account labor for modernization activities even if this activity has not been included in the non-high performer PHA's 5-Year Action Plan.

Period of Availability: The period of availability ends on June 30, 2021.

### **PH-4: ACOP: Adoption of Tenant Selection Policies**

Regulatory Authority: 24 CFR § 960.202(c)(1)

Description: The regulation requires that the PHA policies in the ACOP must be duly adopted and implemented. HUD is waiving this requirement to permit PHAs to adopt and implement changes to the ACOP on an expedited basis, without formal board approval, through March 31, 2021. Any informally adopted revisions under this waiver authority must be formally adopted no later than June 30, 2021.

Period of Availability: The period of availability to informally adopt changes to the PHA ACOP ends on March 31, 2021; the PHA must formally adopt such revisions no later than June 30, 2021.

### **PH-5: Community Service and Self-Sufficiency Requirement (CSSR)**

Statutory Authority: Section 12(c) of the USHA of 1937

Regulatory Authority: 24 CFR § 960.603(a) and 960.603(b)

Description: The statute and regulations require that each adult resident of public housing,

except for any family member that is exempt, must contribute 8 hours per month of community service or participate in an economic self-sufficiency program or a combination of both. A family's noncompliance with the service requirement is grounds for non-renewal of the lease at the end of the lease term. HUD is waiving this requirement and is alternatively suspending the community service and self-sufficiency requirement. If a PHA adopts this waiver, tenants will not be subject to this requirement at the family's next annual reexamination. Upon the family's next annual reexamination, PHAs should report on Form HUD-50058 each individual's CSSR status as either exempt for those that are exempt, or pending for those that are otherwise eligible but for which the suspension prevents a housing authority from determining compliance. After a PHA completes an annual reexamination for any family, the CSSR becomes effective again for family members for the subsequent annual reexamination cycle.

Period of Availability: The period of availability ends on June 30, 2021.

#### **PH-6: Energy Audits**

Regulatory Authority: 24 CFR § 965.302

Description: PHAs are required by this regulation to complete an energy audit for each PHA-owned project not less than once every five years. Due to shelter-in-place orders, and closures of many non-essential businesses, access to qualified energy auditors is likely to be limited during the period of time that the program is affected because of the COVID-19 pandemic. Therefore, HUD is waiving this requirement and is alternatively providing flexibility for PHAs to complete required energy audits. Specifically, any audit due on or after the date of the publication of this notice until December 31, 2021, as well as any audit for which a PHA exercised its discretion to delay the audit for one year under the Notice 2020-13, will be due no later than December 31, 2021. For example, a PHA that chose to adopt the waiver to delay completion of an audit due on November 30, 2020 for one year would now be required to complete that audit by December 31, 2021. Further, any audit due during Calendar Year 2021 must be completed no later than December 31, 2021.

Period of Availability: The period of availability ends on December 31, 2021.

#### **PH-7: Over-Income Families**

Statutory Authority: Section 16(a)(5) of the USHA of 1937

Regulatory Authority: Housing Opportunity Through Modernization Act of 2016: Final Implementation of the Public Housing Income Limit (83 FR 35490, July 26, 2018)

Sub-regulatory Guidance: Notice PIH 2019-11

Description: PHAs are required by statute and the Federal Register Notice to terminate or charge an alternative rent to families whose income exceeds the program maximum income level for two consecutive years. HUD defined the two-year time period as two consecutive reexamination cycles. In order to be consistent with the delay in annual reexaminations permitted under waiver PH and HCV-2, HUD is waiving this requirement and is permitting families to remain in their units and to continue to pay the same rental amount until such time

that a PHA conducts the next annual income recertification that would impact the family. In order to adopt this waiver, PHAs must also adopt a waiver under PH and HCV-2.

Period of Availability: The period of availability ends on June 30, 2021.

#### **PH-8: Resident Council Elections**

Regulatory Authority: 24 CFR § 964.130(a)(1)

Description: The regulations require that resident councils must adhere to certain minimum standards regarding election procedures, including that all procedures must assure fair and frequent elections of resident council members—at least once every three years for each member. HUD recognizes that conducting resident council elections may not be possible as a result of COVID-19 public health actions. HUD is waiving the regulation to allow PHAs to delay resident council elections beyond the three-year limit if necessary. However, the delayed resident council election must be rescheduled and held as soon as reasonably possible once circumstances permit, after June 30, 2021.

Period of Availability: The period of availability of this waiver ends on June 30, 2021.

#### **PH-9: Review and Revision of Utility Allowances**

Regulatory Authority: 24 CFR § 965.507

Description: The regulations require the PHA to review at least annually the basis on which utility allowances have been established and revise allowances if required on the basis of that review. Due to shelter-in-place orders, and closures of many non-essential businesses, PHAs are encouraged to focus administration on critical program functions. Further, access to information on changing utility rates may be limited in some jurisdictions. Therefore, HUD is waiving this requirement to allow PHAs to delay the review and update of utility allowances.

Period of Availability: Any review and update of utility allowances that were due at some point in time in CY 2020 must be completed by June 30, 2021.

#### **PH-10: Tenant Notifications for Changes to Project Rules and Regulations**

Regulatory Authority: 24 CFR § 966.5

Description: PHAs are required by this regulation to provide 30-day notice to impacted families for changes to policies, rules and special charges to families. HUD is waiving the requirement to provide such advance notice, except advance notice must be provided for any changes related to tenant charges. Although HUD is waiving the advanced notice, PHAs must still provide adequate notification to impacted families within 30 days of making such changes. HUD encourages PHAs to give advance notice to the extent feasible.

Period of Availability: The period of availability ends on June 30, 2021.



### **PH-11: Designated Housing Plan Renewals**

Statutory Authority: Section 7(f) of the USHA of 1937

Description: The statute requires that PHAs submit a request to HUD to extend the effective period for Designated Housing Plans upon expiration of the Plan's current effective period. All original designations remain in effect for 5 years from the date HUD approves the Plan; renewals beyond the initial 5 years are granted for 2-year periods. HUD is waiving the statute to extend the effective period through June 30, 2021, for plans due to expire between July 2, 2020 and June 30, 2021. If the request for renewal is not approved upon the expiration of the extended effective period, the Plan will have expired and the designated project or portion of a project will convert to its original status. Therefore, the PHA will need to submit a renewal request at least 60 days prior to the extended expiration date of June 30, 2021.

Period of Availability: The period of availability ends on June 30, 2021.

### **PH-12: Public Housing Agency Annual Self-Inspections**

Statutory Authority: Section 6(f)(3) of the USHA of 1937

Regulatory Authority: 24 CFR § 902.20(d)

Description: The statute requires PHAs which own or operate public housing to make an annual inspection of each public housing project to determine whether units in the project are maintained to applicable standards and remain safe for residents. HUD is waiving the requirement that the PHA must inspect each project during CY 2020.

This waiver does not alleviate the PHA of its responsibility to provide safe housing. PHAs are reminded to expeditiously identify, respond to, and address serious conditions that could jeopardize life or property.

HUD encourages PHAs that choose not to utilize this waiver, or that wish to conduct inspections on a more limited basis to consider establishing and maintaining methods of performing remote, video-assisted or "virtual" inspections of dwelling units to identify maintenance needs while complying with CDC and local guidelines, especially for those units that may not be inspected this year. PHAs should also consider utilizing electronic means (such as videoconferencing, text messaging and email) of receiving maintenance requests and reports of life-threatening safety concerns directly from residents while minimizing in-person interactions. Additionally, it is recommended that PHAs continue to conduct exterior/site inspections or maintenance evaluations in compliance with social distancing requirements outlined by the CDC. As outlined in Maintenance Guidebook II, Chapter 2, Sections A and B, PHAs are required to establish both a regular and emergency maintenance plan. In separate and forthcoming guidance, HUD will describe an approach for the recommencement of Real Estate Assessment Center (REAC) inspections. This guidance may also be helpful to PHAs in determining when to resume self-inspections, however, PHAs will be required to complete an inspection of every public housing property during CY 2021.

Period of Availability: The period of availability ends on December 31, 2020.

### **PH-13: Over-Income Limit: Termination Requirement**

Statutory Authority: Section 16(a) of the United States Housing Act of 1937 as amended by section 103 of the Housing Opportunity Through Modernization Act

Implementation Notice: Housing Opportunity Through Modernization Act of 2016: Final Implementation of Public Housing Income Limit, 83 Fed. Reg. 35,490 (July 26, 2018)

Description: For public housing families whose income has exceeded the over-income limit for the locality (120 percent of the area median income (AMI) or as established by HUD in the Implementation Notice at 83 FR 35490) for two consecutive years, a PHA must terminate the family's tenancy within 6 months of the third income determination or charge the family a monthly rent equal to the greater of: (1) the applicable Fair Market Rent (FMR); or (2) the amount of monthly subsidy for the unit, including amounts from the operating and capital fund (alternative rent). HOTMA requires HUD to determine the alternative rent options for families that remain in public housing through formal rulemaking. However, HUD has not published a final rule that implements this requirement, and PHAs are therefore not yet able to calculate alternative rents.

Due to the ongoing COVID-19 pandemic and the culminating efforts on the federal and local levels to prevent evictions and limit the spread of COVID-19, HUD is waiving the requirement that a family whose income has exceeded the over-income limit for the locality for two consecutive years be terminated within 6 months of the third income determination. As an alternative requirement, a family whose income has exceeded the over-income limit for the locality for two consecutive years will remain public housing households instead of being terminated and will be charged the applicable FMR as the family's monthly rental amount. This waiver will enable PHAs to continue to expend CARES Act supplemental Operating Funds and other funds to maintain and improve the buildings and units in which these households reside including activities to prevent, prepare for and respond to the COVID-19 pandemic.

In an effort to prevent evictions during COVID-19, HUD encourages PHAs to adopt this waiver. PHAs are reminded that if they do not adopt this waiver, they will be required to terminate over-income families within 6 months of their third income determinations because the HOTMA alternative rent structure for such families has not been implemented through final rulemaking. However, PHAs must still comply with any federal, state and local eviction moratorium that is in place.

PHAs must update the ACOP to reflect changes to their over-income policy in accordance with this waiver.

Period of Availability: The period of availability ends on June 30, 2021.

### **PH-14: Annual Choice of Rent**

Statutory Authority: Section 3(a)(2)(A) of the USHA of 1937

Regulatory Authority: 24 CFR § 960.253

Description: Once a year, PHAs must give families the option of choosing between a flat rent and an income-based rent. A family may not be offered this choice more than once per year

with the exception that a family may switch from a flat rent to an income-based rent because of financial hardship. Thus, under current rules families who switch from a flat rent to an income-based rent because of financial hardship may not switch back to a flat rent prior to their next annual recertification. Families experiencing a financial hardship due to the COVID-19 pandemic because of a change in circumstances, for example a loss of employment, may no longer be experiencing such hardship and want to continue paying a flat rent. HUD is waiving the requirement that a family may not be offered a choice of rent more than once a year. Alternatively, a PHA may give families no more than two opportunities to choose between a flat rent and an income-based rent within the same one-year period.

Period of Availability: The period of availability ends on June 30, 2021.

## **11. PHAS, SEMAP, AND UNIFORM FINANCIAL REPORTING STANDARDS**

### **a. PHAS**

Regulatory Authority: 24 CFR Part 902

Description: Part 902 sets out the indicators by which HUD measures the performance of a PHA. The indicators measure a PHA's physical condition, financial condition, management operations, and Capital Fund obligation and occupancy. HUD inspections resumed on October 5, 2020. For any PHAs with a fiscal year end of March 31, 2021, HUD will not issue a new PHAS score unless the PHA requests that a new PHAS score be issued. HUD will instead carry forward the most recent PHAS score on record. For any PHAs with a fiscal year end on and after June 30, 2021, HUD will issue advisory scores through March 31, 2022.

Period of Availability: HUD will resume issuing PHAS scores for PHAs beginning with fiscal years ending on June 30, 2021. The scores will be advisory only for four consecutive quarters ending with PHAs with fiscal years ending on March 31, 2022.

### **b. SEMAP**

Regulatory Authority: 24 CFR § 985.105

Description: Part 985 sets out the requirements by which Section 8 tenant-based assistance programs are assessed. For PHAs that have a SEMAP score pending as of the date of this Notice, and for any PHA with a fiscal year ending on or before December 31, 2020, HUD will not issue a new SEMAP score unless the PHA requests that a new SEMAP score be issued. HUD will instead carry forward the most recent SEMAP score on record.

Period of Availability: HUD will resume issuing new SEMAP scores beginning with PHAs with fiscal year end dates of June 30, 2021.

**b-1: SEMAP Field Office Confirmatory Review**

Regulatory Authority: 24 CFR § 985.105(d)

Description: Allows field offices to perform remote SEMAP confirmatory review instead of an on-site confirmatory review before changing any rating from troubled to standard or high performer.

Period of Availability: The period of availability ends on June 30, 2021.

**b-2: SEMAP Certification Timing**

Regulatory Authority: 24 CFR § 985.101(a)

Description: Waives the requirement for PHAs to submit an annual SEMAP certification in IMS-PIC within 60 days of FYE during the timeframe HUD is rolling over prior year scores.

Period of Availability: The period of availability ends on June 30, 2021.

**c. Uniform Financial Reporting Standards: Filing of Financial Reports; Reporting Compliance Dates**

Regulatory Authority: 24 CFR §§ 5.801(c), 5.801(d)(1)

Description: Section 5.801 establishes uniform financial reporting standards (UFRS) for PHAs (and other entities). Section 5.801(c) requires that PHAs submit financial information in accordance with 24 CFR § 5.801(b) annually, not later than 60 days after the end of the fiscal year of the reporting period. Section 5.801(d)(1) requires that PHAs submit their unaudited financial statements not later than 60 calendar days after the end of their fiscal year, and that PHAs submit their audited financial statements not later than 9 months after the end of their fiscal year.

HUD is waiving these requirements and is providing the alternative requirements for the following PHAs:

- (1) PHAs with a FYE of June 30, 2019; September 30, 2019; December 31, 2019; and March 31, 2020, and a deadline to submit audited financial information in accordance with 24 CFR § 5.801(b) and (d); and

FYE	Due Date	Extended Due Date
6/30/2019	3/31/2020	9/30/2020
9/30/2019	6/30/2020	12/31/2020
12/31/2019	9/30/2020	3/31/2021
3/31/2020	12/31/2020	6/30/2021

- (2) PHAs with a FYE of December 31, 2019 and March 31, 2020, and a deadline to submit unaudited financial information in accordance with 24 CFR § 5.801(b) and (d).

FYE	Due Date	Extended Due Date
12/31/2019	2/29/2020	8/31/2020
3/31/2020	5/31/2020	11/30/2020

Period of Availability: Varies by PHA by FYE, see description for details.

## **12. OTHER WAIVERS AND ADMINISTRATIVE RELIEF**

### **a. PHA Reporting Requirements on HUD Form 50058**

Regulatory Authority: 24 CFR Part 908, § 982.158

Sub-regulatory Guidance: Notice PIH 2011-65

Description: PHAs must submit form HUD-50058 no later than 60 calendar days from the effective date of any action recorded on line 2b of the form HUD-50058 or form HUD-50058 MTW (Moving-To-Work). The Notice states HUD will monitor timeliness of reporting and may sanction a PHA for late reporting.

HUD recognizes that PHAs that implement waivers and alternative requirements under this Notice likely will submit form HUD-50058 later than 60 calendar days from the effective date of certain actions, particularly related to reexaminations and inspections. HUD is waiving the 60-day deadline and providing that PHAs must submit form HUD-50058 or HUD-50058 MTW for transactions impacted by implemented waivers and alternative requirements within 90 days of the effective date of action.

Although this waiver provides up to 90 days for PHAs to submit HUD-50058 forms into IMS-PIC (Inventory Management System–PIH Information Center), HUD encourages those PHAS that are have operational capacity to do so to continue submitting HUD-50058 forms within the normal 60-day timeframe.

PIH recognizes this Notice and any subsequent Notices providing waiver authority to HUD-50058 submission requirements could impact the PHA’s ability to submit HUD-50058 forms into the IMS-PIC system and potentially result in fatal errors. In order to minimize the occurrence of these errors resulting from implementing these waivers, PIH will be issuing guidance in the near future that will provide PHAs with workarounds to avoid any potential issues in the PIC system.

For PHAs that submit HUD-50058 forms and receive a fatal error, PIH will not require these HUD-50058 forms to be re-submitted consistent with the waiver of reporting provisions in the Notice. PIH encourages these PHAs to not re-submit these forms until after PIH issues the revised guidance for HUD-50058 reporting. For PHAs that submit HUD-50058 forms successfully in the interim period before the new reporting guidance

is issued, PIH may require corrections to these HUD-50058 forms and re-submission to IMS-PIC.

Period of Availability: The period of availability ends December 31, 2020.

**b. Designated Housing Plans: HUD 60-Day Notification**

Statutory Authority: Section 7(e)(1) of the USHA of 1937

Description: The statute requires HUD to notify PHAs that have submitted a Designated Housing Plan whether the plan complies with the requirements to establish the designation of a project for occupancy by elderly and/or disabled families no later than 60 days after receiving the plan. Under the statute, if HUD does not respond within 60 days the plan is considered accepted. HUD is temporarily waiving this deadline to ensure that it can review and adequately address any programmatic and fair housing concerns while its operations are impacted by the COVID-19 pandemic but will complete Designated Housing Plan reviews as expeditiously as possible. HUD is waiving the 60-day notification requirement for those plans submitted after March 1, 2020.

Period of Availability: This waiver expired on July 31, 2020.

**c. Extension of Deadline for Programmatic Obligation and Expenditure of Capital Funds**

Statutory Authority: Section 9(j)

Regulatory Authority: 24 CFR § 905.306(d)(5) and 905.306(f)

Description: Section 9(j)(1) requires PHAs to obligate Capital Funds not later than 24 months after the date on which the funds became available, or the date on which the PHA accumulates adequate funds to undertake modernization, substantial rehabilitation, or new construction of units, plus the period of any extension approved under Section 9(j)(2). Section 9(j)(5)(A) requires a PHA to expend Capital Funds not later than four years after the date on which the funds become available for obligation, plus the period of any extension approved under Section 9(j)(2). Section 9(j)(2) authorizes the Secretary to extend the time period for the obligation of Capital Funds for such period as the Secretary determines necessary if the Secretary determines that the failure of the PHA to obligate assistance in a timely manner is attributable to an event beyond the control of the PHA. The authority for extension of the Section 9(j) obligation and extension deadlines for an event beyond the control of the PHA is also found in the implementing regulation at 24 CFR § 905.306 (d)(5). The regulations do not permit extensions of the expenditure dates other than for the period of time of a HUD-approved extension of the obligation deadline.

Period of Availability: HUD is extending both the obligation end date and the expenditure end date for all Capital Fund grants that were open on April 10, 2020, by 18 months from the obligation and expenditure end date in Line of Credit Control System (LOCCS) that was in effect on April 10, 2020; however, no programmatic expenditure end date shall be extended beyond one month prior to the closure of the relevant appropriation account, pursuant to 31 U.S.C. § 1552.

**d. Section 6(j) 1- and 2-Year Substantial Improvement Requirement**

Statutory Authority: Section 6(j)(3)(B)(ii)

Regulatory Authority: 24 CFR § 902.75(d)

Description: PHAs that are designated troubled under PHAS are required by statute and regulation to, within the first full fiscal year after the initial release of the troubled designation, improve the PHAS score by 50 percent of the difference between the initial score and the score required to get the PHA out of troubled status; and, within the second full fiscal year after the initial release of the troubled designation, improve the PHAS score to at least the score required to get the PHA out of troubled status.

Item 11(a) of Notice PIH 2020-05, restated in Notice PIH 2020-13, provided that HUD will not issue a new PHAS score unless the PHA requests that a new PHAS score be issued for any PHA that had a PHAS score pending or any PHA with a fiscal year ending on or before December 31, 2020. Item 11(a) of this Notice extends the provision to any PHA with a fiscal year ending on or before March 31, 2021 and specifies that the scores will be advisory only for four consecutive quarters ending with PHAs with fiscal years ending on March 31, 2022.

Due to the suspension of the issuance of new PHAS scores, the 1 and 2-year statutory and regulatory substantial improvement benchmarks may fall on the same fiscal year for a troubled PHA. Therefore, for PHAs designated as troubled prior to the date of this Notice that have not received a PHAS assessment for the first full fiscal year after the initial notice of the troubled designation, HUD will: (1) evaluate the 1-year substantial improvement benchmark based on the first released score for fiscal years ending on or after June 30, 2022; and, (2) toll the evaluation of the 2-year recovery benchmark to the next sequential fiscal year. HUD waives Section 6(j)(3)(B)(ii) and 24 CFR § 902.75(d) to the extent that these provisions conflict with this alternative requirement.

During this period while PHAS scores are suspended or advisory, HUD will continue using all information available to HUD to identify and address critical deficiencies that may have a negative impact on resident health and safety and other programmatic deficiencies. Further, PHAs subject to a Memorandum of Agreement (MOA) must continue to comply with the terms and conditions of such MOAs, and may be subject to declarations of substantial default as outlined in HUD regulations.

Period of Availability: The period of availability for this waiver and alternative requirement: (1) is effective on the date of this Notice; and, (2) will continue through June 30, 2023, at which time HUD will reevaluate any additional impacts of this waiver on any PHA in the process of being evaluated.

e. **Mod Rehab Program Waivers Established in Notice PIH 2020-20 and Extended in this Notice**

**MR-1: Family Income and Composition: Delayed Annual Examinations**

Statutory Authority: Section 3(a)(1) of the USHA of 1937

Regulatory Authority: 24 CFR § 882.515(a)

Description: PHAs are required to conduct a reexamination of family income and composition at least annually. Recognizing the foreseeable difficulties in complying with this requirement in light of the COVID-19 pandemic, HUD is waiving this statutory and regulatory requirement to permit PHAs to delay annual reexaminations of Mod Rehab families.

Period of Availability: All annual recertifications due in Calendar Year (CY) 2020 must be completed by June 30, 2021. Reexams due between 1/1/21 and 6/30/21 must be completed by 6/30/21.

**MR-0: Family Income and Composition: Annual Examination; Income Verification Requirements**

Regulatory Authority: 24 CFR §5.233(a)(2)

Sub-regulatory Guidance: Notice PIH 2018-18

Description: PHAs are required to use the Enterprise Income Verification (EIV) System for verification of family income at the annual examination. 24 CFR §5.233(a)(2) requires PHAs to use EIV as a third-party source to verify tenant employment and income information during mandatory reexaminations or recertifications of family composition and income in accordance with §5.236 and administrative guidance issued by HUD. Notice PIH 2018-18 describes the required verification hierarchy process PHAs must follow. HUD understands that documentation may be difficult to obtain as a result of the COVID-19 pandemic. PHAs are also facing challenges with securely accessing HUD systems while many if not all staff are working remotely.

To address these challenges, HUD is waiving the requirements to use the income hierarchy described by Notice PIH 2018-18 and will allow PHAs to forgo third-party income verification requirements for annual reexaminations, including the use of EIV, if the PHA wishes to conduct the annual recertification rather than delaying the family's annual recertification (as permitted under MR-1 above).

During the allowable period of availability, PHAs may consider self-certification as the highest form of income verification to process annual reexaminations. This may occur over the telephone (but must be documented by PHA staff with a contemporaneous written record), through an email or postal mail with a self-certification form by the tenant, or through other electronic communications. PHAs are encouraged to incorporate procedures to remind families of the obligation to provide true and complete information.



PHAs are further reminded that there is no HUD requirement that income and family composition examinations and recertifications must be conducted in-person unless determined necessary as a reasonable accommodation for a person with a disability. In such cases, PHAs may look to applicable public health guidelines and any state or local ordinance on how to maintain appropriate health precautions (e.g., social distancing).

PHAs that conduct annual examinations under this waiver/alternative requirement will be responsible for addressing any material discrepancies (i.e., unreported income or a substantial difference in reported income) that may arise later. For example, if a tenant self-certified that the tenant lost their job, but later the EIV Income Validation Tool (IVT) shows the tenant's employment continued, the PHA must take enforcement action in accordance with their policies and procedures.<sup>4</sup>

Period of Availability: The period of availability to conduct annual reexams using these modified verification requirements ends on June 30, 2021.

### **MR-3: Family Income and Composition: Interim Examinations**

Statutory Authority: Section 3(a)(1) of the USHA of 1937

Regulatory Authority: 24 CFR §§ 5.233(a)(2), 882.515(b)

Sub-regulatory Guidance: Notice PIH 2018-18

Description: 24 CFR § 882.515(b) provides that if the PHA receives information concerning a change in the family's income or other circumstances between regularly scheduled reexaminations, the PHA must consult with the family and make any adjustments determined to be appropriate. Any change in the family's income or other circumstances that results in an adjustment in the Total Tenant Payment, Tenant Rent, and Housing Assistance Payment must be verified. In most cases, the reason a family requests an interim determination is due to a loss in income or a change in family composition.

PHAs are required to use EIV for verification of family income at interim reexamination. 24 CFR § 5.233(a)(2) requires PHAs to use EIV as a third-party source to verify tenant employment and income information during mandatory reexaminations or recertifications of family composition and income in accordance with §5.236 and administrative guidance issued by HUD. Notice PIH 2018-18 further describes the required verification hierarchy process PHAs must follow.

To assist PHAs that may be prioritizing the processing of interim reexaminations due to decreases in family income and mitigate the challenges of transferring documentation

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<sup>4</sup> Consistent with Section 15 of Notice PIH 2018-18, if the EIV Income or IVT Report reveal an income source that was not reported by the tenant or a substantial difference in the reported income information, the PHA is required to take specific actions which may include determining any retroactive rent due. PHAs may consider adding such a reminder to families in any self-certification forms.

during periods of shelter-in-place/stay-at-home efforts in response to the COVID-19 pandemic, HUD is waiving the requirements to use the income verification hierarchy as described by Notice PIH 2018-18. HUD will allow PHAs to forgo third-party income verification requirements for interim reexaminations, including the required use of EIV. During the allowable period of eligibility, PHAs may consider self-certification as the highest form of income verification to process interim reexaminations. This may occur over the telephone (with a contemporaneous written record by the PHA staff person), through an email with a self-certification form by the family, or through other electronic communications.

As noted in the previous waiver description, there is no HUD requirement that income and family composition examinations and recertifications must be conducted in-person unless it may be necessary as a reasonable accommodation for a person with a disability. In such cases, PHAs may look to applicable public health guidelines and any state or local ordinance on how to maintain appropriate health precautions (e.g., social distancing).

PHAs that conduct interim reexaminations under this waiver/alternative requirement will be responsible for addressing any material discrepancies (i.e., unreported income or a substantial difference in reported income) that may arise later. For example, if a tenant self-certified that the tenant lost their job, but later the EIV IVT Report shows the tenant's employment continued, the PHA must take enforcement action that is consistent with its policies and procedures.<sup>5</sup>

Period of Availability: The period of availability ends on June 30, 2021.

#### **MR-4: Enterprise Income Verification Monitoring**

Regulatory Authority: 24 CFR § 5.233

Sub-regulatory Guidance: Notice PIH 2018-18

Description: Notice PIH 2018-18 specifies the required monitoring of EIV reports. For example, PHAs are required to monitor the Deceased Tenants Report, the Identity Verification Report, the Immigration Report, the IVT Report, and the Multiple Subsidy Report and the New Hires Report on a monthly basis. Recognizing the challenges PHAs are facing with many if not all staff working remotely, HUD is waiving the mandatory EIV monitoring requirements. PHAs are reminded that EIV data is overwritten; monthly or quarterly reports must be downloaded to preserve the data for a particular month or quarter.

Period of Availability: The period of availability ends on June 30, 2021.

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<sup>5</sup> Consistent with Section 15 of Notice PIH 2018-18, if the EIV Income or IVT Report reveal an income source that was not reported by the tenant or a substantial difference in the reported income information, the PHA is required to take specific actions which may include determining any retroactive rent due. PHAs may consider adding such a reminder to families in any self-certification forms.

### **MR-5: PHA Inspection Requirement: Annual Inspections**

Regulatory Authority: 24 CFR § 882.516(b)

Description: The Mod Rehab Program regulations require that the PHA must inspect or cause to be inspected each dwelling unit under contract at least annually and at such other times as may be necessary to assure that the owner is meeting the obligations to maintain the unit in decent, safe and sanitary condition and to provide the agreed upon utilities and other services. The PHA must take into account complaints and any other information coming to its attention in scheduling inspections.

HUD recognizes the unprecedented challenge the COVID-19 pandemic poses to PHAs in carrying out the most essential of Mod Rehab program administrative responsibilities – ensuring that assisted families are living in decent, safe, and sanitary housing. However, conducting physical inspections of units in many communities during the COVID-19 pandemic poses its own health risks for families, participating owners, and PHA personnel, and may run counter to public health orders, directives, or recommendations such as shelter-in-place or other social distancing practices designed to contain and reduce exposure to COVID-19.

In order to provide PHAs with the necessary flexibilities to postpone the normally required inspections, HUD is waiving the annual inspection requirement and is allowing PHAs to delay annual inspections for Mod Rehab units. All delayed annual inspections must be completed as soon as reasonably possible but no later than one year after the date the annual inspection would have been required absent the waiver.

Any PHA that applies this waiver to its Mod Rehab program retains the right to conduct an inspection on any assisted unit at any time. The PHA must grant the reasonable accommodation requests of tenants with disabilities related to inspections. For example, a tenant with a respiratory disability may ask that an inspection be delayed in light of COVID-19 or that the inspectors wear masks and gloves and maintain a six-foot distance when entering their unit.

Crucially, use of this waiver by the PHA does not relieve owners of their responsibility to maintain the unit in accordance with HQS as required in the HAP contract, nor does it in any way restrict the PHA from taking action to enforce the owner's obligations.

Period of Availability: The PHA must conduct the delayed annual inspection as soon as reasonably possible but no later than one year after the date the annual inspection would have been required absent the waiver.

### **MR-6: Adjustment of Utility Allowance**

Regulatory Authority: 24 CFR § 882.510

Description: The regulations require that the PHA must determine, at least annually, whether an adjustment is required in the Utility Allowance applicable to units assisted under the Mod Rehab program on grounds of changes in utility rates or other change of

general applicability to all units in the Mod Rehab program.

HUD is waiving this requirement to allow PHAs to delay the review and update of utility allowances.

Period of Availability: Any review and update of utility allowances that were due at some point in time in CY 2020 must be completed no later than June 30, 2021.

**PHA Reporting Requirements for Mod Rehab on HUD Form 50058.** PHAs must submit form HUD-50058 no later than 60 calendar days from the effective date of any action recorded on line 2b of the form HUD-50058. Notice PIH 2011-65 states HUD will monitor timeliness of reporting and may sanction a PHA for late reporting.

In Notice PIH 2020-05, published on April 10, 2020, HUD exercised its authority under the CARES Act to establish waivers and administrative flexibilities to provide relief to PHAs administering the public housing and HCV programs. Through that notice, HUD waived the 60-day deadline and provided that PHAs must submit form HUD-50058 for transactions impacted by implemented waivers and alternative requirements within 90 days of the effective date of action. HUD recognizes that PHAs that implement Mod Rehab waivers and alternative requirements under this Notice will also likely submit form HUD-50058 later than 60 calendar days from the effective date of certain actions, particularly related to reexaminations and inspections. Consequently, HUD is similarly waiving the 60-day deadline for the Mod Rehab program and providing that PHAs must submit form HUD-50058 for transactions within 90 days of the effective date of action.

Although this waiver provides up to 90 days for PHAs to submit HUD-50058 forms into IMS-PIC (Inventory Management System-PIH Information Center), HUD encourages those PHAs that have operational capacity to do so to continue submitting HUD-50058 forms within the normal 60-day timeframe.

PIH recognizes this Notice and any subsequent Notices providing waiver authority to HUD-50058 submission requirements could impact the PHA's ability to submit HUD-50058 forms into the IMS-PIC system and potentially result in fatal errors. In order to minimize the occurrence of these errors resulting from implementing these waivers, PIH will be issuing guidance in the near future that will provide Mod Rehab PHAs with workarounds to avoid any potential issues in the PIC system.

For PHAs that submit HUD-50058 forms and receive a fatal error, PIH will not require these HUD-50058 forms to be re-submitted consistent with the waiver of reporting provisions in the Notice. PIH encourages these PHAs to not re-submit these forms until after PIH issues the revised guidance for HUD-50058 reporting. For PHAs that submit HUD-50058 forms successfully in the interim period before the new reporting guidance is issued, PIH may require corrections to these HUD-50058 forms and re-submission to IMS-PIC.

Period of Availability: The period of availability ends June 30, 2021.

f. **Mainstream Voucher Waivers Established in Notice PIH 2020-22 and Extended in this Notice**

**MS-1: Initial Lease Term**

Regulatory Authority: 24 CFR 982.309(a)(2)(ii)

Description: Under the HCV program, voucher participants must enter into an initial lease term with the owner for one year, unless the PHA determines that a shorter term would improve housing opportunities for the tenant and the shorter term is a prevailing market practice. To provide a greater range of housing opportunities for Mainstream voucher holders, the PHA may enter initial lease terms of less than one year regardless of whether the shorter lease term is a prevailing market practice. Therefore, both section 8(o)(7)(A) of the 1937 Act (42 U.S.C. 1437f(o)(7)(A)) and 24 CFR 982.309(a)(2)(ii) are waived.

Period of Availability: The period of availability ends on June 30, 2021.

**MS-2: Criminal Background Screening**

Regulatory Authority: 24 § CFR 5.856 §, 982.553(a)

Description: PHAs are required to apply the same criminal background screening process to all HCV participants. As discussed in section 2 of this notice, HUD encourages PHAs to use their Mainstream vouchers to prevent, prepare for, and respond to coronavirus which, for some communities, will mean finding long term housing solutions for those transitioning out of institutional settings or currently in rapid rehousing or other emergency temporary housing. To help PHAs assist populations in need of transitioning into long term housing, PHAs may establish, as an alternative requirement, screening requirements for applicants for Mainstream vouchers which are distinct from those in place for its HCV program in general. At a minimum, PHAs must comply with the statutory (and implementing regulatory) requirements to determine if applicants are subject to a lifetime sex offender registration requirement (42 U.S.C. 13663(a) and 24 CFR 5.856) and comply with the mandatory screening and denial requirements outlined in 42 U.S.C. 13661 and 982.553(a).

Period of Availability: The period of availability ends on June 30, 2021.

**MS-3: Mainstream Age Eligibility to Enter HAP Contract Statutory Authority**

Statutory Authority: 42 U.S.C. 8013(k)(2)

Description: The statute provides that the eligible member of a Mainstream household must be non-elderly, defined as at least 18 years of age and under 62 years of age (not yet reached their 62<sup>nd</sup> birthday) to be eligible to be placed under HAP contract. A Mainstream-eligible individual issued a voucher at 61 years of age may not be able to lease the voucher before their 62<sup>nd</sup> birthday where PHA operations may have been shut down or severely curtailed, unit searches are not possible due to shelter-in-place orders, or where the movement of people is significantly restricted. As an alternative

requirement, the PHA may choose to expand the definition of an eligible non-elderly family member to include those who were issued a voucher prior to turning 62 and were not yet 63 on the effective date of the HAP Contract.

Period of Availability: The period of availability ends on June 30, 2021.

## **SECTION II: WAIVERS APPLICABLE TO NATIVE AMERICAN PROGRAMS**

### **13. WAIVERS AND ALTERNATIVE REQUIREMENTS APPLICABLE TO THE IHBG PROGRAM UNDER THE NATIVE AMERICAN HOUSING ASSISTANCE AND SELF-DETERMINATION ACT OF 1996 (NAHASDA), AS AMENDED**

Introduction: The CARES Act provides HUD with broad authority, in the context of the COVID-19 pandemic, to waive statutes and regulations (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment) for the IHBG program. The following waivers and alternative requirements apply only to new IHBG funding provided under the CARES Act (IHBG-CARES grants), and FY 2020 IHBG formula funds under the Further Consolidated Appropriations Act, 2020. IHBG recipients are reminded that these waivers and alternative requirements do not apply to IHBG funds appropriated in any other prior year. In applying these waivers and alternative requirements, IHBG recipients must ensure that they are doing so only with respect to IHBG-CARES grants and their FY 2020 IHBG grant.

The CARES Act also provides that any waivers granted by HUD shall be deemed to be effective as of the date an Indian tribe or TDHE began preparing for COVID-19. Accordingly, the relief provided by the following waivers and alternative requirements will apply retroactively to the date that the respective IHBG recipient began preparing for COVID-19. Additionally, any related costs previously incurred by IHBG recipients that are also eligible and allowable IHBG-CARES costs may be covered or reimbursed with IHBG-CARES grant funding. Recipients should maintain documentation demonstrating when the recipient began preparing for COVID-19. Such documentation should be maintained to ensure that both HUD and the recipient can clearly identify the date when waivers and alternative requirements issued by HUD began to apply, and to support costs incurred by the recipient that it covers or reimburses with IHBG-CARES grant funding.

HUD has determined that the following waivers and alternative requirements are necessary to expedite or facilitate the use of IHBG funds to prevent, prepare for, and respond to COVID-19.

Period of Availability: The period of availability of each IHBG waiver and alternative requirement below ends when funds subject to the waiver and alternative requirement are expended, unless otherwise specified under each waiver and alternative requirement (e.g., Indian Housing Plan (IHP) / Annual Performance Report (APR) deadline extensions).

#### **a. Application Process for IHBG-CARES Grants and Indian Housing Plan Requirements**

Statutory Authority: Section 101(b), Section 102, and Section 103 of NAHASDA

Regulatory Authority: 24 C.F.R. §§ 1000.214; 1000.218; 1000.220; 1000.224; 1000.226; 1000.228; 1000.230; and 1000.232

Description: Section 101(b), Section 102, and Section 103 of NAHASDA and the implementing regulations in Subpart C of 24 CFR Part 1000 require IHBG recipients to submit an IHP that must be found to be in compliance with NAHASDA as a condition of

receiving an IHBG grant. HUD is required to act on IHP submissions within 60 days or it is deemed approved. These provisions also provide that IHBG recipients may amend their IHPs and outline the process of HUD review of such IHP amendments. Certain IHP amendments that add new activities or involve a decrease in the amount of funds provided to protect and maintain the viability of housing assisted under the 1937 Act known as Formula Current Assisted Stock (FCAS) units require HUD to review such modifications and determine that they comply with NAHASDA. HUD is required to act on such modifications within 30 days.

HUD recognizes the challenges that Indian tribes and TDHEs are facing at the present time. Many IHBG recipients are shut down for business. Many Indian tribes have declared a state of emergency, limited travel, and have imposed social distancing directives to minimize the risk of spreading COVID-19 in their communities. This has had a severe impact on Tribes' and TDHEs' abilities to conduct business.

To facilitate and expedite the use of IHBG-CARES grant funding and FY 2020 IHBG funding for COVID-19 related purposes, HUD is waiving the requirements in Section 101(b), Section 102, and Section 103 of NAHASDA, and regulations in Subpart C of 24 CFR Part 1000, including 24 CFR §§ 1000.214; 1000.218; 1000.220; 1000.224; 1000.226; 1000.228; 1000.230; and 1000.232, only to the extent necessary to establish the following alternative requirements:

In recognition of the limited ability of Indian tribes and TDHEs to conduct regular business at this time, HUD is minimizing application requirements while also ensuring that IHBG recipients will expend CARES Act funding in accordance with the Act and program requirements.

1) *Abbreviated IHP to Receive IHBG-CARES Grant Funding*

Given the current exigent situation, applicants for IHBG-CARES grants funding will only be required to submit an Abbreviated IHP, in accordance with guidance that will be published by HUD in the very near future, in order to receive an IHBG-CARES grant. An Abbreviated IHP is a more streamlined version of the regular IHP.

These Abbreviated IHPs must specify how the IHBG recipient will carry out activities or projects that meet the requirements of the CARES Act (to prevent, prepare for, and respond to COVID-19), will allow the IHBG recipient to rely on certain information included in its previously submitted FY 2020 IHP, and provide HUD with specific information that will be requested in further guidance. To the extent feasible, HUD will expedite its review and approve all Abbreviated IHPs within 15 days to expedite awarding grant funding under the CARES Act.

Abbreviated IHPs that HUD fails to act on in a timely manner will not be deemed to be approved by operation of law.

HUD will also accept any Abbreviated IHPs that cannot be formally adopted by an Indian Tribe or TDHE in accordance with their normal policies and procedures for adopting IHPs, provided an official or principal of the Indian tribe or TDHE who is authorized to act on behalf of the Indian tribe or TDHE provides a statement to HUD



indicating that it is not practical or safe for the Indian tribe or TDHE to assemble a board or other governing body to conduct business to secure required approvals, at the time, due to the impact of COVID-19 on operations of the Indian tribe or TDHE (or the beneficiary Indian tribe of the TDHE). The Indian tribe or TDHE should take the necessary action, at a later date, when it is feasible and safe to do so, to either ratify the Abbreviated IHP previously submitted by the official or principal, if required under its policies and procedures, or submit an amendment to the Abbreviated IHP.

2) *Recipients that did Not Submit an IHP in FY 2020*

Section 101(b)(1) of NAHASDA states that the Secretary may make a grant under the Act if an IHP is submitted and determined to comply with the requirements of Section 102 of the Act.

Sections 101(b)(1) and (2) are waived for any Tribe or TDHE that did not submit an IHP, or whose IHP was not approved in FY 2020, and accordingly did not receive an IHBG grant in FY 2020. A Tribe or TDHE that did not receive IHBG funds in FY 2020 may still apply to receive an IHBG-CARES grant, provided it submits an Abbreviated IHP to HUD, in accordance with further guidance that will be published by HUD. HUD may require additional information from these recipients but will seek to streamline the application process to ensure that funding can be awarded as expeditiously as possible, while also ensuring compliance with the CARES Act and NAHASDA. This waiver is necessary to provide an opportunity to all potential IHBG applicants to access this new funding to help address the ongoing crisis, regardless of whether they failed to submit an IHP in FY 2020.

3) *IHP Certifications*

Some Indian tribes and TDHEs have expressed to HUD that under the current conditions, they likely will have difficulty securing required internal approvals to be able to provide HUD with information normally required under a regular IHP. This includes certifications submitted by an Indian tribe authorizing a TDHE to act as its IHBG recipient, and other certifications of compliance required under Section 102(b) of NAHASDA.

Accordingly, HUD is waiving the IHP certification requirements in Section 101-103 of NAHASDA and establishing the following alternative requirements as follows: IHBG recipients are required to provide HUD with all required IHP certifications in their Abbreviated IHPs. However, if an authorized official of an Indian tribe or TDHE provides a statement to HUD indicating that it is not practical or safe for the Indian tribe or TDHE to secure new certifications due to the impact of COVID-19 on its operations, or the operations of a beneficiary Indian tribe, HUD will, consistent with Section 103(d) of NAHASDA, accept all IHP certifications that were previously submitted and accepted by HUD for FY 2020 IHBG grants (or for FY 2019 IHBG grants for those IHBG recipients that have not yet submitted their FY 2020 IHP), in lieu of requiring new tribal certifications to be submitted. IHBG recipients that

choose to use this alternative requirement will be deemed to have submitted such past certifications for the IHBG-CARES grant and will be bound by such certifications, accordingly.

Under this alternative requirement, TDHEs may submit Abbreviated IHPs on behalf of their beneficiary Indian tribes without having to provide any required new IHP Tribal certifications when applying for IHBG CARES Act funds or amending their FY 2020 IHBG IHPs for COVID-19 related purposes. However, these TDHEs are required to consult with their beneficiary Indian tribes that they serve, in a manner that is feasible and when it is safe and practical to do so, and submit any appropriate amendments or certifications to their Abbreviated IHPs if they are directed to do so by the beneficiary Indian tribe.

4) Reprogramming of FY 2020 IHBG Funding

HUD strongly encourages IHBG recipients to consider reprogramming existing FY 2020 IHBG funding to help address COVID-19, because this funding likely is more immediately available. To expedite and facilitate the use of such funds for this purpose, HUD is waiving Section 103 of NAHASDA and 24 CFR § 1000.230 to the extent necessary to allow IHBG recipients to expend IHBG FY 2020 funds on IHBG activities that meet the eligible purposes of the CARES Act (to prevent, prepare for, and respond to COVID-19), including activities made eligible under the waivers and alternative requirements provided in this Notice, without first having to amend their FY 2020 IHP. IHBG recipients that choose to do this must still amend their FY 2020 IHP before submitting their APR to reflect these new uses or activities, but may request an extension of time to submit the IHP amendment and subsequent APR if submission is not feasible and safe for Tribal or TDHE staff at the time they would otherwise be due.

Additionally, HUD is waiving the requirement in 24 CFR § 1000.232 that provides that certain IHP amendments that add new activities or involve a decrease in the amount of funds provided to protect and maintain the viability of FCAS units require HUD to review such modifications and determine that they comply with NAHASDA. IHBG recipients may reprogram FY 2020 funding to add new activities and decrease funding for FCAS units without HUD prior review and approval, provided that the IHBG recipient is carrying out eligible COVID-19-related IHBG activities. IHBG recipients that choose to do this must still amend their FY 2020 IHP before submitting their APR to reflect these new uses or activities, but may request an extension of time to submit the IHP amendment and subsequent APR if submission is not feasible and safe for Tribal or TDHE staff at the time they would otherwise be due.

**b. IHP Submission Deadline for Annual IHBG Formula Grants**

Statutory Authority: Section 101(b) and 102(a) of NAHASDA

Regulatory Authority: 24 CFR §§ 1000.214, 1000.216, 1000.225

Description: Section 101(b) of NAHASDA permits the Secretary to make a grant on behalf of an Indian tribe for a fiscal year only if the Indian tribe has submitted an IHP for such fiscal year. Section 102(a) of NAHASDA requires the IHP be submitted no later than 75 days before the beginning of each tribal program year.

Due to the disruption in Tribal and TDHE operations caused by COVID-19, and to facilitate recipients' efforts to respond, HUD is waiving these requirements and modifying them to allow for a new IHP submission deadline for recipients with program years beginning April 1, 2020, and July 1, 2020. IHBG recipients with these program years beginning these dates may submit their IHP for their program year on or before October 16, 2020. Additionally, IHBG recipients with program years beginning October 1, 2020, may submit their IHP for their program year on or before January 17, 2021. HUD is also establishing alternative requirements for the content of IHPs.

**Original and Extended IHP Due Dates by Program Year Starts**

<b>Program Year Starts</b>	<b>Original IHP Due Date</b>	<b>Extended IHP Due Date</b>
4/1/2020	1/17/2020	10/16/2020
7/1/2020	4/17/2020	10/16/2020
10/1/2020	7/18/2020	1/17/2021

As the ongoing COVID-19 pandemic progresses, HUD will assess whether additional extensions are needed and may grant further extensions, if appropriate.

**c. Annual Performance Report Submission Deadline**

Statutory Authority: Sections 403 and 404 of NAHASDA

Regulatory Authority: 24 CFR § 1000.514

Description: NAHASDA requires that, not less frequently than annually, each recipient must review the activities conducted and housing assisted under the Act to assess compliance with the IHBG program requirements. The results of each review must be included in an APR submitted to the Secretary under Section 404 and made available to the public. 24 CFR § 1000.514 of IHBG Regulations requires the APR be submitted to HUD within 90 days of the end of a recipient's program year.

Due to the disruption in Tribal and TDHE operations caused by COVID-19, and to facilitate recipients' efforts to respond, HUD is establishing an alternative requirement under which IHBG recipients with Program Years ending December 31, 2019, submit their APRs for their program year on September 27, 2020, IHBG recipients with program years ending March 31, 2020, submit their APR for their program year on December 30, 2020, and IHBG recipients with program years ending June 29, 2020, submit their APR for their program year on December 30, 2020.

**Original and Extended APR Due Dates by Program Year Ends**

<b>Program Year Ends</b>	<b>Original APR Due Date</b>	<b>Extended APR Due Date</b>
12/31/2019	3/30/2020	9/27/2020
3/31/2020	6/29/2020	12/30/2020
6/29/2020	9/30/2020	12/30/2020

As the ongoing COVID-19 pandemic progresses, HUD will assess whether additional extensions are needed and may grant further extensions, if appropriate.

**d. Income Verification**

Regulatory Authority: 24 CFR § 1000.128

Description: 24 CFR § 1000.128 requires IHBG recipients to verify that a family is income-eligible. Families are required to provide documentation to verify this determination, and a recipient is required to maintain that documentation. Families may be required by the IHBG recipient to periodically verify income after initial occupancy, and the recipient is required to maintain documentation.

Given the COVID-19 related challenges facing families seeking IHBG assistance, families currently receiving IHBG assistance that are due for income recertification, and Tribal and TDHE staff charged with verifying income and maintaining documentation, HUD is establishing the following alternative requirement under 24 CFR § 1000.128:

- 1) IHBG recipients may deviate from their current written admissions and occupancy policies, and may allow less frequent income recertifications; and
- 2) IHBG recipients may carry out intake and other tasks necessary to verify income remotely if the IHBG recipient or eligible families chooses to do so, including allowing income self-certification over the phone (with a written record by the IHBG recipient’s staff), or through an email with a self-certification form signed by a family.

**e. Public Health Services**

Statutory Authority: Section 202(3) of NAHASDA

Description: Section 202(3) of NAHASDA authorizes the use of IHBG funds for the provision of housing-related services for affordable housing. Under this eligible activity, IHBG funds can be used to provide services such as housing counseling, activities related to the provision of self-sufficiency and other services related to assisting owners, tenants, contractors, and other entities, participating or seeking to participate in the IHBG program.

HUD is waiving Section 202(3) and establishing an alternative requirement to the extent necessary to allow IHBG funds to be used to carry out a wide range of public health services under this category of eligible activities. Accordingly, in addition to the housing services normally eligible under Section 202(3), IHBG recipients may be used on a wide

range of public health activities designed to allow IHBG-eligible residents and staff of the IHBG recipient to prepare for, prevent, and respond to COVID-19.

Eligible uses of IHBG funds under this waiver and alternative requirement include, but are not limited to: providing testing, diagnosis or other related services to residents; establishing a fixed or mobile location to conduct testing and treatment; paying for necessary equipment, supplies, and materials, including personal protective equipment; carrying out public health services designed to help staff, eligible residents, and other third-party providers serving eligible residents, prepare for, prevent, and respond to COVID-19; delivering meals on wheels or other food delivery services to eligible residents that are sheltered-in-place and complying with a stay at home order, or otherwise maintaining recommended social distancing.

HUD strongly encourages IHBG grantees to coordinate with recipients of other Federal sources of funding for this purpose, including funding provided by the Indian Health Service, to ensure IHBG funds are used to supplement rather than supplant such funding.

**f. COVID-19-Related Assistance to Non-Low Income and Non-Native Families**

Statutory Authority: Section 201(b) of NAHASDA

Regulatory Authority: 24 CFR §§ 1000.104, 1000.106, 1000.108, 1000.110, 1000.312, 1000.314, 1000.318

Description: Section 201(b) of NAHASDA and its implementation regulations, except for specified exceptions, limit assistance under eligible housing activities to low-income Indian families.

The COVID-19 pandemic poses a unique threat to the health and safety of Tribal communities. Persons infected with the virus, regardless of income or tribal membership, pose a health risk to the entire community, and low-income families are especially vulnerable given the severe overcrowding in Indian Country, infrastructure challenges, and the lack of access to running water and readily available health care services in many remote communities. To effectively prevent, prepare for, and respond to COVID-19, IHBG recipients may find the need to use IHBG resources or NAHASDA-assisted housing units to provide shelter-in-place housing and public health services to otherwise ineligible persons and families, with the goal of protecting the health and safety of the most vulnerable low-income Native American families who may be infected.

Given this, HUD is waiving Section 201(b) and its implementing regulations, and establishing alternative requirements to the extent necessary to allow IHBG funds to be used by recipients to prevent, prepare for, and respond to COVID-19 through the following limited activities that provide assistance to all affected and threatened people without regard to income limits or Indian status: temporary shelter-in-place, isolation centers, purchasing and making medical testing kits available, purchasing and distributing masks and other personal protection equipment, emergency food preparation and distribution, cleaning and decontamination, and other directly related activities.

Permanent rental assistance, mortgage assistance, housing rehabilitation, and new housing construction may not be provided for the benefit of such otherwise ineligible

families under this waiver and alternative requirement.

This assistance may only be provided to such otherwise ineligible families if: it is provided during the COVID-19 pandemic; if it is designed to protect the health and safety of low-income Native American families; if it is provided on an urgent basis (as documented by the IHBG recipient); and if it is temporary in nature. When providing this assistance, IHBG recipients must maintain records documenting that these criteria were met at the time that such assistance was provided.

Under this waiver and alternative requirement, IHBG recipients may house low-income non-Indian families or over-income Indian and non-Indian families in NAHASDA-assisted units, including FCAS units), to shelter-in-place those families per CDC guidelines to protect low-income Indian families and the Tribal community from the further spread of COVID-19, regardless of income or Indian status. IHBG funds may also be used to provide temporary rental assistance to otherwise ineligible persons or families in privately owned units, hotels/motels, and similar facilities designed to shelter-in-place or isolate infected persons from others, if the criteria under this waiver and alternative requirements are met. The use of NAHASDA-assisted units, including FCAS, or funds for the temporary shelter-in-place or isolation of any individuals shall be temporary and no individual shall be isolated longer than medically necessary.

24 CFR §§ 1000.312 and 1000.314 identify FCAS units as low rent, Mutual Help, and Turnkey III housing units owned and operated by an IHBG recipient. 24 CFR § 1000.318 establishes when these units can be considered FCAS for purposes of the IHBG formula. These regulations are also waived and modified to the extent necessary to not impact the FCAS eligibility of FCAS units used for this purpose of addressing COVID-19 regardless of income or Indian status, provided such units are operated as low income housing dwelling units once no longer needed to shelter-in-place persons, and upon a determination that such units are safe to be occupied again by low income families not infected with COVID-19.

Assistance provided in accordance with this waiver shall not count towards the maximum amount of assistance that IHBG recipients may otherwise provide to non-low-income families specified in 24 CFR § 1000.110.

By providing temporary assistance to address the immediate health, safety, and economic needs of all citizens in Indian Country, recipients can better insure the health and safety of low-income Indian families in their communities.

**g. Useful Life**

Statutory Authority: Section 205 of NAHASDA

Regulatory Authority: 24 CFR §§ 1000.141, 1000.142, 1000.143, 1000.144, 1000.146, 1000.147

Description: Section 205(a)(2) of NAHASDA requires each dwelling unit in a recipient's housing developed or assisted under the Act will remain affordable, according to binding commitments satisfactory to HUD, for the remaining useful life of the property. The

IHBG regulations require each recipient to describe, in its IHP, its determination of the useful life of the assisted housing units in its developments in accordance with the local conditions of the Indian area of the recipient. By approving the IHP, HUD determines the useful life in accordance with Section 205(a)(2).

HUD is waiving these requirements to determine and maintain affordability during the useful life of housing units assisted with IHBG-CARES grant funding and FY 2020 IHBG funding used to address COVID-19 if that assistance is related to cleanup of COVID-19 contamination and temporary use dwelling units for purposes of housing and quarantining families to inhibit the spread of COVID-19 to low-income Indian families and the Tribal community.

#### **h. Total Development Cost Limits**

Regulatory Authority: 24 CFR §§ 1000.156, 1000.158, 1000.160, 1000.162

Description: The IHBG regulations require that affordable housing under NAHASDA be of moderate design with a size and with amenities consistent with unassisted housing offered for sale in the Indian tribe's general geographic area to buyers who are at or below the area median income. To achieve this requirement the recipient must either, adopt written standards for its affordable housing programs that reflect the requirement specified, or use TDC limits published periodically by HUD that establish the maximum amount of funds (from all sources) that the recipient may use to develop or acquire/rehabilitate affordable housing. The limits provided by the TDC may not, without prior HUD approval, exceed by more than 10 percent the TDC maximum cost for the project. Non-dwelling structures used to support an affordable housing activity must be of a design, size and with features or amenities that are reasonable and necessary to accomplish the purpose intended by the structures.

HUD expects that COVID-19 will likely have both a short- and long-term impact on IHBG recipients' programs. Because of the long-term need to prevent, prepare for, and respond to COVID-19, IHBG recipients may find it appropriate to use IHBG-CARES grant funds to acquire or construct new housing units with the goal of reducing severe overcrowding in Indian Country that leave Native American populations, particularly the elderly and persons with disabilities, especially vulnerable to COVID-19. Accordingly, HUD is establishing an alternative requirement relating to limitations on cost or design standards and TDC with respect to dwelling and non-dwelling units developed, acquired or assisted with funding provided to be used by recipients to prevent, prepare for, and respond to COVID-19. An IHBG recipient may exceed the current TDC maximum by 20 percent without HUD review or approval if the purpose of the development, acquisition or assistance is to prevent, prepare for, and respond to COVID-19. The recipient, however, must maintain documentation that indicates the dwelling and non-dwelling units developed, acquired or assisted with this funding will, after this crisis, be for IHBG eligible families and the design, size, and amenities are moderate and comparable to housing in the area. The TDC limits can be exceeded by more than 20 percent if the recipient receives written approval from HUD Headquarters. This waiver applies to both single-family and multi-family housing, as well as non-dwelling structures supporting an activity to prevent, prepare for, and respond to COVID-19.

Period of Availability: This waiver and alternative requirement is available only so long as the Total Development Costs specified in Notice PIH 2019-19 remain in effect.

**i. Prohibition Against Investment of CARES Act Grant Funds**

Statutory Authority: Section 204(b) of NAHASDA

Regulatory Authority: 24 CFR § 1000.58

Description: Section 204(b) of NAHASDA permits IHBG recipients to invest grant amounts for the purposes of carrying out affordable housing activities in investment securities and other obligations as approved by HUD. Under 24 CFR § 1000.58 of the IHBG regulations, HUD has approved certain IHBG recipients based, among other things, on a history of compliance and capacity, to invest IHBG funding certain securities and interest-bearing accounts for the purpose of carrying out affordable housing activities.

HUD is waiving Section 204(b) of NAHASDA and 24 CFR § 1000.58 and prohibiting the investment of any IHBG funding provided under the CARES Act. Such funding is to be used by recipients to prevent, prepare for, and respond to COVID-19, including to maintain normal operations and fund eligible affordable housing activities under NAHASDA during the period that each recipient's program is impacted by COVID-19. Given the limited scope of this funding to address the immediate health, safety and economic needs of citizens in Indian Country, drawing down funds for investment in securities and long-term interest-bearing accounts is prohibited.

**j. IHBG-CARES Funds Not Counted in Undisbursed Funds Factor**

Regulatory Authority: 24 CFR § 1000.342

Description: 24 CFR § 1000.342 codifies the UDFP in the IHBG formula. It provides that if an Indian tribe's initial IHBG allocation calculation is \$5 million or more and the Indian tribe has undisbursed IHBG funds on October 1 of the fiscal year for which the allocation is made in an amount that is greater than the sum of the prior 3 years' initial allocation calculations, its grant allocation will be the greater of the initial allocation calculation minus the amount of undisbursed IHBG funds that exceed the sum of the prior 3 years' initial allocation calculations, or its 1996 Minimum.

HUD is waiving 24 CFR § 1000.342 and establishing an alternative requirement to the extent necessary to exclude IHBG-CARES funds from counting towards an Indian tribe's undisbursed IHBG funds from prior years under the UDFP. IHBG-CARES funds are available for a specific purpose under the CARES Act and were allocated by HUD to allow Indian tribes and TDHEs to prevent, prepare for, and respond to COVID-19. If this funding were counted against an Indian tribe and resulted in it receiving less IHBG formula funding under the next IHBG formula allocation, such a reduction in future funding would undermine the purposes of the IHBG-CARES funds and have an adverse impact on Indian tribes working to respond to the current National Emergency.



#### **14. WAIVERS AND ALTERNATIVE REQUIREMENTS APPLICABLE TO THE INDIAN COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM**

Introduction: Pursuant to the CARES Act, HUD may waive, or specify alternative requirements for, any provision of any statute or regulation that HUD administers in connection with the use of amounts made available for the ICDBG program under the CARES Act (ICDBG-CARES grants), and FY 2020 ICDBG funds (both Single Purpose Grants and Imminent Threat Grants) appropriated under the Further Consolidated Appropriations Act of 2020 (Public Law 116–94) (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment), upon a finding by HUD that any such waivers or alternative requirements are necessary to expedite or facilitate the use of such amounts to prevent, prepare for, and respond to COVID-19. HUD has since determined that these flexibilities can also be granted with respect to ICDBG funds appropriated under the FY 2019 Consolidated Appropriations Act (Public Law 116-6).

Accordingly, the following waivers and alternative requirements apply only to ICDBG-CARES grants (the new ICDBG funding provided under the CARES Act), and FY 2019 and FY 2020 ICDBG funds. ICDBG grantees are reminded that these waivers and alternative requirements do not apply to ICDBG funds appropriated in any other prior year. In applying these waivers and alternative requirements, ICDBG grantees must ensure that they are doing so only with respect to ICDBG-CARES grant funding and their FY 2019 and FY 2020 ICDBG grant(s).

The CARES Act also provides that any waivers granted by HUD shall be deemed to be effective as of the date an Indian tribe began preparing for COVID-19. Accordingly, the relief provided by following waivers and alternative requirements will apply retroactively to the date that the respective ICDBG grantee began preparing for coronavirus. Additionally, any related costs previously incurred by ICDBG grantees that are also eligible and allowable ICDBG-CARES costs may be covered or reimbursed with ICDBG funding provided under the CARES Act. ICDBG-CARES grantees should maintain documentation demonstrating when the grantee began preparing for COVID-19. Such documentation should be maintained to ensure that both HUD and the grantee can clearly identify the date when waivers and alternative requirements issued by HUD began to apply, and to support costs incurred by the recipient that it covers or reimburses with ICDBG-CARES grant funding.

HUD has determined that the following waivers and alternative requirements are necessary to expedite or facilitate the use of ICDBG funds to prevent, prepare for, and respond to COVID-19.

Period of Availability: The period of availability of each ICDBG waiver and alternative requirement below ends when funds subject to the waiver and alternative requirement are expended, unless otherwise specified under each waiver and alternative requirement.

##### **a. Citizen Participation**

Statutory Authority: Section 104 of the Housing and Community Development Act of 1974 (HCD Act)

Regulatory Authority: 24 CFR §§ 1003.604,1003.305(c)(3)

Description: Section 104 of the HCD Act and 24 CFR § 1003.604 requires ICDBG

applicants to consult with residents prior to submitting their funding applications. The regulation mandates minimum citizen participation requirements, including holding one or more meetings to obtain the views of residents. 24 CFR § 1003.305(c)(3) requires ICDBG recipients to meet the citizen participation requirements of 24 CFR § 1003.604 before amending previously awarded ICDBG grants.

Considering COVID-19-related social distancing directives, and other prohibitions against large in-person gatherings, in person citizen meetings are not advised. Accordingly, HUD is waiving 24 CFR § 1003.604(a)(2) and 24 CFR § 1003.305(c)(3), and will not require Indian tribes to hold one or more meetings to obtain the views of residents before applying for ICDBG-CARES grant funding or amending their FY 2020 ICDBG grants to address COVID-19. Indian tribes will continue to be required, however, to meet the citizen participation requirements by publishing or posting information on their plans to use ICDBG grants, and accepting and considering comments, to the extent the Indian tribe determines that that can be done without subjecting residents to unnecessary risks to health and safety. Such alternative requirements to publish or post information for their plans must ensure effective communication with persons with disabilities. Indian tribes may also choose to hold virtual meetings with the public to meet these streamlined citizen participation requirements, if feasible.

When holding a virtual meeting, a grantee should take appropriate steps to ensure effective communication with persons with disabilities consistent with the requirements of accessibility laws, such as Section 504 of the Rehabilitation Act and ensuring meaningful access for persons with limited English proficiency.

For virtual meetings, such steps will include ensuring that information is provided on an accessible website, that e-mails and other digital notifications are accessible, and that the application or platform used to host the hearing is also accessible. Additional services such as audio description or captioning may also be needed to provide effective communication in a digital context. Helpful guidelines for ensuring the accessibility of web-based and digital materials are available through the World Wide Web Consortium's Web Accessibility Initiative at <https://www.w3.org/WAI/>. Examples of auxiliary aids and services that may be necessary when conducting hearings online can be found at 28 C.F.R. § 35.104. If no method of conducting a virtual hearing is available that appropriately accommodates an individual's disability, the grantee may not hold against the individual his or her inability to participate in the hearing, and an in-person hearing may be scheduled for a later date when the unnecessary risks to the health and safety of participants have alleviated.

Additionally, grantees should be mindful that many low-income persons may not be able to participate in a virtual meeting due to lack of Internet access. Grantees are encouraged to also make any virtual meetings available via telephone so that persons can participate even if they do not have access to the Internet.

**b. Application Process for ICDBG-CARES Grants and Funding Criteria**

Regulatory Authority: 24 CFR §§ 1003.400, 1003.401, 1003.402; Section I.A.1.b. of the combined FY 2019/2020 ICDBG Notice of Funding Availability (NOFA)

Description: The regulation at 24 CFR § 1003.400 specifies the funding criteria for ICDBG Imminent Threat (IT) grants. It provides that: 1) The urgency and immediacy of the threat must be independently verified before an ICDBG IT application can be approved by HUD; 2) Funds may only be used to deal with imminent threats that are not of a recurring nature and which represent a unique and unusual circumstance, and which impact on an entire service area; 3) HUD will establish grant ceilings. The regulation at 24 CFR § 1003.401 specifies the application process that applicants must follow. The regulation at 24 CFR § 1003.402 addresses the availability of funding and what happens to remaining unobligated ICDBG IT funds at the end of each fiscal year. It provides that if any reserved funds are not used to fund ICDBG IT grants during a fiscal year, they will be added to the allocation of ICDBG funds for the subsequent fiscal year and will be used as if they were a part of the new allocation.

The COVID-19 pandemic has resulted in a declared national emergency and is a domestic and international crisis. This is a unique well-documented emergency that is having an impact on all Tribal communities. Considering this, HUD is waiving and modifying 24 CFR § 1003.400, 24 CFR § 1003.401, 24 CFR § 1003.402, and Section I.A.1.b. of FY 2019/2020 ICDBG NOFA to the extent necessary to provide for the following alternative requirements:

1) Criteria for Funding

HUD issued further guidance in the ICDBG-CARES Implementation Notice (Notice PIH 2020-11) on the application process and criteria for ICDBG applicants applying for ICDBG-CARES grants to address the COVID-19 pandemic.

With respect to applications for ICDBG-CARES grants and FY 2019 and 2020 ICDBG Imminent Threat grants to address the COVID-19 pandemic: The urgency and immediacy of the threat need not be independently verified before approval of an application. The urgency and immediacy of the threat will be presumed by HUD, unless HUD has evidence to the contrary. Similarly, these applications need not demonstrate that COVID-19 is a non-recurring imminent threat and that it has an impact on an entire service area. HUD will presume these criteria are met unless HUD has evidence to the contrary.

2) Grant Ceilings

For ICDBG-CARES grants, HUD is waiving the current ICDBG Imminent Threat grant ceilings (currently set at \$450,000 for projects in areas that have not received a Presidential Major Disaster Declaration, and \$900,000 for areas that have received a Presidential Major Disaster Declaration). HUD published grant ceilings in Notice PIH 2020-11.

HUD may also further revise these grant ceilings in the future depending on how the pandemic evolves, program demand, the availability of additional appropriations, and related factors. HUD will notify Indian tribes in writing if these grant ceilings are revised in the future.

### 3) Reimbursement of Costs and Letter to Proceed

The CARES Act provides that ICDBG-CARES grant funds provided under the Act may be used to cover or reimburse allocable costs to prevent, prepare for, and respond to COVID-19 incurred by an ICDBG applicant, including costs incurred prior to the enactment of the Act. Accordingly, any previous costs incurred by an ICDBG applicant or grantee before the enactment of the Act may be reimbursed with ICDBG-CARES grant funding.

Considering this, HUD is waiving 24 CFR § 1003.400(b) to the extent necessary to allow ICDBG applicants and grantees to receive ICDBG-CARES grants without having to demonstrate to the satisfaction of HUD that other Tribal funding sources cannot be made available to alleviate the threat. Additionally, HUD will not consider recently awarded IHBG funding provided under the CARES Act, and regular IHBG funding that has already been budgeted in the relevant IHP or contracted, when assessing available Federal resources. HUD is also waiving the letter to proceed provision in 24 CFR § 1003.401(a) so that ICDBG applicants and grantees do not need to have received a letter to proceed from the Area ONAP as a condition of reimbursing themselves for eligible costs already incurred that can be reimbursed pursuant to the CARES Act.

Also, pursuant to 24 CFR § 1003.605(b) and 24 CFR § 58.34(a)(10), grants to provide assistance for temporary or permanent improvements that do not alter environmental conditions and are limited to protection, repair, or restoration activities necessary only to control or arrest the effects from disasters or imminent threats to public safety including those resulting from physical deterioration do not have to submit a Request for Release of funds and certification. However, the responsible entity must document in writing its determination that each activity or project is exempt from environmental review.<sup>6</sup> In the case of imminent threat activities that do not meet the conditions in 24 CFR § 58.34(a)(10) for exemption from environmental review, ICDBG applicants or recipients may not commit ICDBG funds to reimburse expenses for such activities until HUD approves a Request for Release of Funds.

ICDBG-CARES grantees remain responsible for ensuring that they are coordinating locally, and with other Federal agencies, to ensure that funds are used appropriately to address gaps in funding, and to avoid any duplication of benefits.

### 4) Availability of Funds

HUD is waiving 24 CFR § 1003.402 which provides that if any reserved funds are not used to fund IT grants during a fiscal year, they will be added to the allocation of ICDBG funds for the subsequent fiscal year and will be used as if they were a part of the new allocation. HUD is waiving this regulation to expedite and facilitate the use of ICDBG-CARES grant funds to address COVID-19. If ICDBG-CARES grant funds are not awarded in a fiscal year, HUD will assess how the COVID-19 pandemic is

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<sup>6</sup> Additional guidance on the use and documentation of 24 CFR 58.34(a)(10) is available at [CPD Notice 20-07](#).

progressing, program demand, available funding, and related factors, and reserves the right to adjust how funding is awarded to ensure needs of tribes are met, including possibly setting aside a portion of funding to address the needs of Tribes with the greatest needs. HUD may also award additional funding through the IHBG-CARES program if a sufficient amount of ICDBG-CARES funding remains unobligated after a period of time and projected program demand is low.

**c. Removal of Public Services 15 Percent Cap under FY 2019 and FY 2020 ICDBG Grants**

Statutory Authority: Section 105 of HCD Act

Regulatory Authority: 24 CFR § 1003.201(e); FY 2019/2020 ICDBG NOFA

Description: Section 105 of the HCD Act and the ICDBG implementing regulation at 24 CFR § 1003.201(e) authorize the use of ICDBG funds to carry out public services activities, but provide that the amount of ICDBG funds used for public services shall not exceed 15 percent of the respective ICDBG grant. Congress lifted the 15 percent cap on public services funded under the ICDBG Imminent Threat funding appropriated under the CARES Act and for FY 2019 and FY 2020 ICDBG funding in recognition of the great and immediate need for public services to help address and prepare for the impact of COVID-19 in Tribal communities.

Accordingly, HUD is waiving Section 105 of the HCD Act, 24 CFR § 1003.201(e), and language in the definition of the term “public services” in the FY 19/20 ICDBG NOFA to the extent necessary to remove the 15 percent cap on FY 2019/2020 ICDBG funding (both Single Purpose and Imminent Threat grants), to align with ICDBG Imminent Threat funding provided under the CARES Act. ICDBG grantees that have been awarded FY 2019/2020 ICDBG funds are reminded that they must still comply with the provisions of 24 CFR § 1003.305 if they are seeking to amend their grants to carry out additional public services or other activities to prevent, prepare for, or respond to COVID-19.

**d. Rental Assistance, Utility Assistance, Food, Clothing, and Other Emergency Assistance**

Statutory Authority: Section 105 of the HCD Act.

Regulatory Authority: 24 CFR § 1003.207(b)(4)

Description: Section 105(a)(8) authorizes the use of ICDBG funds for a variety of public services. Under the implementing regulation at 24 CFR § 1003.207(b)(4), the general rule is that ICDBG funds may not be used for income payments. For purposes of the ICDBG program, income payments mean a series of subsistence-type grant payments made to an individual or family for items such as food, clothing, housing (rent or mortgage) or utilities, but excludes emergency payments made over a period of up to three months to the provider of such items or services on behalf of an individual or family.

COVID-19 is having a substantial negative impact on Native American families’ ability

to work, earn an income, pay their rent or mortgage, access or pay for food and clothing, and access many other essential services. Many tribes and TDHEs have reported to HUD that they shut down and community members are sheltering in place. Additionally, HUD expects that tribes will need to respond to long-term impacts of COVID-19. To help Tribal communities address these challenges, HUD is waiving Section 105(a)(8) and 24 CFR § 1003.207(b)(4) to the extent necessary to establish the following alternative requirement:

- 1) ICDBG grant funds may be used to provide emergency payments for low and moderate income individuals or families impacted by COVID-19 for items such as food, medicine, clothing, and other necessities, as well as rental assistance and utility payment assistance, without regard for the 3-month limitation in 24 CFR § 1003.207(b)(4), but for a period not to exceed six months unless further expanded by HUD at a later date. At this time, emergency mortgage assistance will remain limited to no more than 3 months under 24 CFR § 1003.207(b)(4). However, HUD may provide additional waiver relief for ICDBG-funded mortgage assistance at a later date as the COVID-19 pandemic progresses. Indian tribes are reminded that the CARES Act provided foreclosure and forbearance relief for borrowers under the Section 184 Indian Home Loan Guarantee program, as well as other borrowers.
- 2) These emergency payments must be used to either cover costs incurred directly by the ICDBG grantee in cases where the ICDBG grantee is providing this assistance, or made directly to a third party provider of such items or services on behalf of an individual or family, and may not be paid directly to an individual or family in the form of income payments, debit cards, or similar direct income payments. ICDBG grantees may establish lines of credit with third party providers (e.g., grocery stores) on behalf of specific beneficiary families, provided all expenses can be properly documented and all ICDBG-CARES funds used for this purpose are expended on eligible activities. In all cases, ICDBG grantees must ensure that proper documentation is maintained to ensure that all costs incurred are eligible.

ICDBG grantees using this alternative requirement must document, in its policies and procedures, how they will determine the amount of assistance to be provided is necessary and reasonable.

#### **e. Purchase of Equipment**

Regulatory Authority: 24 CFR §§ 1003.207(b)(1); 1003.201(c)(1)(ii)

Description: The purchase of equipment with ICDBG funds is generally ineligible under 24 CFR § 1003.207(b)(1), with some exceptions.

Given the immediate need for medical and personal protective equipment, and other related equipment needed to help prevent, prepare for, and respond to the COVID-19 pandemic in Tribal communities, HUD is waiving 24 CFR § 1003.207(b)(1) and authorizing the use of ICDBG funds for the purchase of equipment necessary to prevent,

prepare for, and respond to the COVID-19. Equipment must be used for authorized program purposes, and any proceeds from the disposition of equipment will be considered ICDBG-CARES program income. HUD may issue further guidance in the future on the disposition of program income after grant closeout.

ICDBG grantees must ensure that ICDBG funds are used to supplement other Federal sources of funding for this purpose, including funding provided by the Indian Health Service, and should not be used to supplant such funding.

**f. Operating Expenses for Public Facilities**

Regulatory Authority: 24 CFR § 1003.207(b)(2)

Description: 24 CFR § 1003.207(b)(2) provides that expenses associated with repairing, operating or maintaining public facilities, improvements and services are generally ineligible, with some exceptions.

Indian tribes may find the need to use ICDBG funds to fund a variety of public facilities, including constructing facilities for testing, diagnosis, or treatment, rehabilitating existing facilities to establish infectious disease treatment clinics, acquiring and converting hotels, motels, or similar facilities to expand capacity of hospitals to accommodate isolation of patients during recovery, and more. These facilities will likely need to be operated and maintained for the duration of the COVID-19 pandemic. Accordingly, HUD is waiving 24 CFR § 1003.207(b)(2) to the extent necessary to allow the use of ICDBG funds to pay for such operating and maintenance expenses of any public facility, to the extent it is used for COVID-19-related purposes. In incurring such costs, ICDBG grantees may not use this waiver to pay for associated staffing costs of such public facilities. ICDBG grantees must also ensure that ICDBG funds are used to supplement other Federal sources of funding for this purpose, including funding provided by the Indian Health Service, and should not be used to supplant such funding.

**g. New Housing Construction by Tribes**

Statutory Authority: Section 105 of the HCD Act

Regulatory Authority: 24 CFR § 1003.207(b)(3)

Description: 24 CFR 1003.207(b)(3) generally prohibits the use of ICDBG funds for new housing construction, with some exceptions. ICDBG may be used for new housing construction if provided as last resort housing under 24 CFR Part 42, or when carried out by a Community-Based Development Organization (CBDO).

As HUD found in its 2017 Native American Housing Needs Study, severe overcrowding and substandard housing is a major challenge in Indian Country. These conditions increase risks of infection amongst low- and moderate-income Native American families. Indian tribes may find the need to construct temporary or permanent new housing to help prevent, prepare for, and respond to COVID-19, and may find it necessary to do so without having to carry out such activities through a CBDO. Accordingly, HUD is waiving and modifying Section 105 of the HCD Act and 24 CFR 1003.207(b)(3) to the

extent necessary to provide for the following alternative requirement: Indian tribes and tribal organizations may use ICDBG funds to carry out new housing construction when such construction is carried out to reduce overcrowding, or to otherwise prevent, prepare for, or respond to COVID-19.

When assessing applications for ICDBG-CARES grants that propose to carry out new housing construction, HUD will only fund applications that propose to carry out new housing construction that is clearly designed to prevent, prepare for, and respond to COVID-19, and that the applicant plans to carry out expeditiously. As a reminder, such new housing construction must meet applicable federal accessibility requirements, including requirements under Section 504 of the Rehabilitation Act and 24 CFR part 8 HUD will issue additional ICDBG-CARES implementation guidance in the near future.

**15. Further Information.** Questions concerning this Notice should be submitted by email to the following HUD mailbox: [PIH-covidwaivers@hud.gov](mailto:PIH-covidwaivers@hud.gov).

/s/

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R. Hunter Kurtz  
Assistant Secretary for Public and  
Indian Housing



## Appendix:

The availability period for the following waivers and alternative requirements is extended through June 30, 2021:

- PH and HCV-2: Family Income and Composition: Delayed Annual Examinations
- PH and HCV-3: Family Income and Composition: Annual Examination; Income Verification Requirements
- PH and HCV-4: Family Income and Composition: Interim Examinations
- PH and HCV-5: Enterprise Income Verification (EIV) Monitoring
- PH and HCV-6: Family Self-Sufficiency (FSS) Contract of Participation: Contract Extension
- PH and HCV-7: Waiting List: Opening and Closing; Public Notice
- HQS-1: Initial Inspection Requirements
- HQS-2: Project-Based Voucher (PBV) Pre-HAP Contract Inspections: PHA Acceptance of Completed Units
- HQS-3: Initial Inspection: Non-Life-Threatening Deficiencies (NLT) Option
- HQS-4: HQS Initial Inspection Requirement: Alternative Inspection Option
- HQS-5: HQS Inspection Requirement: Biennial Inspections
- HQS-6: HQS Interim Inspections
- HQS-7: PBV Turnover Unit Inspections
- HQS-8: PBV HAP Contract: HQS Inspections to Add or Substitute Units
- HQS-9: HQS Quality Control Inspections
- HQS-11: Homeownership Option: Initial HQS Inspection
- HCV-1: Administrative Plan
- HCV-2: Information When Family is Selected: PHA Oral Briefing
- HCV-3: Term of Voucher: Extensions of Term
- HCV-4: PHA Approval of Assisted Tenancy: When HAP Contract is Executed
- HCV-5: Absence from Unit
- HCV-6: Automatic Termination of HAP Contract
- HCV-7: Increase in Payment Standard During HAP Contract Term
- HCV-8: Utility Allowance Schedule: Required Review and Revision
- HCV-9: Homeownership Option: Homeownership Counseling
- HCV-10: Family Unification Program (FUP): FUP Youth Age Eligibility to Enter HAP Contract
- HCV-11: Family Unification Program (FUP): Length of Assistance for Youth
- HCV-12: Family Unification Program (FUP): Timeframe for Referral
- HCV-13: Homeownership: Maximum Term of Assistance
- HCV-14: Mandatory Removal of Unit from PBV HAP Contract
- PH-3: Cost and Other Limitations: Types of Labor
- PH-4: ACOP: Adoption of Tenant Selection Policies
- PH-5: Community Service and Self-Sufficiency Requirement (CSSR)
- PH-7: Over-Income Families
- PH-8: Resident Council Elections
- PH-9: Review and Revision of Utility Allowance

- PH-10: Tenant Notifications for Changes to Project Rules and Regulations
- PH-11: Designated Housing Plan Renewals

The availability period for the following waivers and alternative requirements is extended through December 31, 2021:

- PH-6: Energy Audits

The availability period for the specific administrative relief items is extended as follows:

- For item 11a: PHAS, HUD will resume issuing new PHAS scores starting with PHAs with FYE dates of 6/30/21.
- For item 11b: SEMAP, HUD will resume issuing new SEMAP scores starting with PHAs with FYE dates of 6/30/21.
- For item 12c: Extension of Deadline for Programmatic Obligation and Expenditure of Capital Funds, HUD is extending both the obligation end date and the expenditure end date for all Capital Fund grants that were open on April 10, 2020, by 18 months from the obligation and expenditure end date in LOCCS that was in effect on April 10, 2020.

The following Mod Rehab Program waivers and alternative requirements established in Notice PIH 2020-20 are extended through June 30, 2021, in this Notice:

- MR-0 Family Income and Composition: Annual examination; Income Verification Requirements
- MR-1 Family Income and Composition: Delayed Annual Examination
- MR-3 Family Income and Composition: Interim Examinations
- MR-4 Enterprise Income Verification (EIV) Monitoring
- MR-5 PHA Inspection Requirement: Annual Inspections
- MR-6 Adjustment of Utility Allowance

The following Mainstream voucher waivers and alternative requirements established in Notice PIH 2020-22 are extended through June 30, 2021, in this Notice:

- MS-1 Mainstream Initial Lease Term
- MS-2 Mainstream Criminal Background Screening
- MS-3 Mainstream Age Eligibility to Enter HAP Contract Statutory Authority

**Attachment I: 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 the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
PH and HCV-1 PHA 5-Year and Annual Plan Submission Dates: Significant Amendment Requirements	<u>Statutory Authority</u> Section 5A(a)(1), Section 5A(b)(1), Section 5A(g), Section 5A(h)(2)  <u>Regulatory Authority</u> §§ 903.5(a)(3), 903.5(b)(3), 903.13(c), 903.21, 903.23	<ul style="list-style-type: none"> <li>Alternative dates for submission</li> <li>Changes to significant amendment process</li> </ul>	<ul style="list-style-type: none"> <li>Varies based on FYE</li> <li>12/31/20</li> </ul>		
PH and HCV-2 Family Income and Composition: Delayed Annual Examinations	<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"> <li>Permits the PHA to delay the annual reexamination of income and family composition</li> <li>HCV PHAs must implement HCV-7 for impacted families if they implement this waiver</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> </ul> All reexams due in CY20 must be completed by 12/31/20. Reexams due between 1/1/21 and 6/30/21 would need to be completed by 6/30/21.		

**Attachment I: 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.)**

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
PH and HCV-3 Family Income and Composition: Annual Examination; Income Verification Requirements	<u>Regulatory Authority</u> §§ 5.233(a)(2), 960.259(c), 982.516(a)  <u>Sub-regulatory Guidance</u> Notice PIH 2018-18	<ul style="list-style-type: none"> <li>• 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</li> <li>• PHAs that implement this waiver will be responsible for addressing material income discrepancies that may arise later</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		
PH and HCV-4 Family Income and Composition: Interim Examinations	<u>Statutory Authority</u> Section 3(a)(1)  <u>Regulatory Authority</u> §§ 5.233(a)(2), 982.516(c)(2), 960.257(a), (b) and (d), 960.259(c)  <u>Sub-regulatory Guidance</u> Notice PIH 2018-18	<ul style="list-style-type: none"> <li>• Waives the requirement to use the income verification requirements, including the use of EIV, for interim reexaminations</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		

**Attachment I: Summary of Public Housing and HCV Waivers and Alternative Requirements  
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Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
PH and HCV-5 Enterprise Income Verification (EIV) Monitoring	<u>Regulatory Authority</u> § 5.233  <u>Sub-regulatory Guidance</u> Notice PIH 2018-18	<ul style="list-style-type: none"> <li>• Waives the mandatory EIV monitoring requirements</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		
PH and HCV-6 Family Self-Sufficiency (FSS) Contract of Participation: Contract Extension	<u>Regulatory Authority</u> § 984.303(d)	<ul style="list-style-type: none"> <li>• Provides for extensions to FSS contract of participation</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		
PH and HCV-7 Waiting List: Opening and Closing; Public Notice	<u>Regulatory Authority</u> § 982.206(a)(2)  <u>Sub-regulatory Guidance</u> Notice PIH 2012-34	<ul style="list-style-type: none"> <li>• Waives public notice requirements for opening and closing waiting list</li> <li>• Requires alternative process</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		
HQS-1 Initial Inspection Requirements	<u>Statutory Authority</u> Section 8(o)(8)(A)(i), Section 8(o)(8)(C)	<ul style="list-style-type: none"> <li>• Changes initial inspection requirements, allowing for owner certification that there are no life-threatening deficiencies</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		

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Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
	<u>Regulatory Authority</u> §§ 982.305(a), 982.305(b), 982.405	<ul style="list-style-type: none"> <li>Where self-certification was used, PHA must inspect the unit no later than 1-year anniversary of date of owner’s certification</li> <li>Will include reminder that HQS waiver does not include a waiver of 24 CFR 35.15, visual assessment for deteriorated paint</li> </ul>	<ul style="list-style-type: none"> <li>1-year anniversary of date of owner’s certification</li> </ul>		
HQS-2: Project-Based Voucher (PBV) Pre-HAP Contract Inspections: PHA Acceptance of Completed Units	<u>Statutory Authority:</u> Section 8(o)(8)(A)  <u>Regulatory Authority:</u> §§ 983.103(b), 983.156(a)(1)	<ul style="list-style-type: none"> <li>Changes inspection requirements, allowing for owner certification that there are no life-threatening deficiencies</li> <li>Where self-certification was used, PHA must inspect the unit no later than 1-year anniversary of date of owner’s certification</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> <li>1-year anniversary of date of owner’s certification</li> </ul>		

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Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
<p>HQS-3 Initial Inspection: Non-Life-Threatening Deficiencies (NLT) Option</p>	<p><u>Statutory Authority</u> Section 8(o)(8)(A)(ii)</p> <p><u>Sub-regulatory Guidance</u> HOTMA HCV Federal Register Notice January 18, 2017</p>	<ul style="list-style-type: none"> <li>Allows for extension of up to 30 days for owner repairs of non-life threatening conditions</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> </ul>		
<p>HQS-4 HQS Initial Inspection Requirement: Alternative Inspection Option</p>	<p><u>Statutory Authority</u> Section 8(o)(8)(A)(iii)</p> <p><u>Sub-regulatory Guidance</u> HOTMA HCV Federal Register Notice January 18, 2017</p>	<ul style="list-style-type: none"> <li>Under Initial HQS Alternative Inspection Option - allows for commencement of assistance payments based on owner certification there are no life-threatening deficiencies</li> <li>Where self-certification was used, PHA must inspect the unit no later than 1-year anniversary of date of owner's certification</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> <li>1-year anniversary of date of owner's certification</li> </ul>		

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Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
HQS-5 HQS Inspection Requirement: 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"> <li>• Allows for delay in biennial inspections</li> <li>• PHAs must require owner certification there are no life-threatening deficiencies</li> <li>• All delayed biennial inspections must resume by 6/30/21 and be completed by 12/31/21</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> <li>• 12/31/21</li> </ul>		
HQS-6 HQS 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"> <li>• Waives the requirement for the PHA to conduct interim inspection and requires alternative method</li> <li>• Allows for repairs to be verified by alternative methods</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		
HQS-7 PBV Turnover Unit Inspections	<u>Regulatory Authority</u> § 983.103(c)	<ul style="list-style-type: none"> <li>• Allows PBV turnover units to be filled based on owner certification there are no life-threatening deficiencies</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		



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Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
		<ul style="list-style-type: none"> <li>Allows for delayed full HQS inspection NLT than 1-year anniversary of date of owner's certification</li> </ul>	<ul style="list-style-type: none"> <li>1-year anniversary of date of owner's certification</li> </ul>		
<p>HQS-8: PBV HAP Contract: HQS Inspections to Add or Substitute Units</p>	<p><u>Statutory Authority</u> Section 8(o)(8)(A)</p> <p><u>Regulatory Authority</u> §§ 983.207(a), 983.207(b)</p> <p><u>Sub-regulatory Guidance</u> HOTMA HCV Federal Register Notice January 18, 2017</p>	<ul style="list-style-type: none"> <li>Allows for PBV units to be added or substituted in the HAP contract based on owner certification there are no life-threatening deficiencies</li> <li>Allows for delayed full HQS inspection NLT 1-year anniversary of date of owner's certification</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> <li>1-year anniversary of date of owner's certification</li> </ul>		
<p>HQS-9 HQS Quality Control Inspections</p>	<p><u>Regulatory Authority</u> §§ 982.405(b), 983.103(e)(3)</p>	<ul style="list-style-type: none"> <li>Provides for a suspension of the requirement for QC sampling inspections</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> </ul>		

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HQS-10 Housing Quality Standards: Space and Security	<u>Regulatory Authority</u> § 982.401(d)	<ul style="list-style-type: none"> <li>• Waives the requirement that each dwelling unit have at least 1 bedroom or living/sleeping room for each 2 persons.</li> </ul>	Remains in effect one year from lease term or date of this Notice, whichever is longer		
HQS-11 Homeownership Option: Initial HQS Inspection	<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"> <li>• Waives the requirement to perform an initial HQS inspection in order to begin making homeownership assistance payments</li> <li>• Requires family to obtain independent professional inspection</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		
HCV-1 Administrative Plan	<u>Regulatory Authority</u> § 982.54(a)	<ul style="list-style-type: none"> <li>• Establishes an alternative requirement that policies may be adopted without board approval until 3/31/21</li> <li>• Any provisions adopted informally must be adopted formally by 6/30/21</li> </ul>	<ul style="list-style-type: none"> <li>• 3/31/21</li> <li>• 6/30/21</li> </ul>		

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Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
HCV-2 Information When Family is Selected: PHA Oral Briefing	<u>Regulatory Authority</u> §§ 982.301(a)(1), 983.252(a)	<ul style="list-style-type: none"> <li>• Waives the requirement for an oral briefing</li> <li>• Provides for alternative methods to conduct required voucher briefing</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		
HCV-3 Term of Voucher: Extensions of Term	<u>Regulatory Authority</u> § 982.303(b)(1)	<ul style="list-style-type: none"> <li>• Allows PHAs to provide voucher extensions regardless of current PHA policy</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		
HCV-4 PHA Approval of Assisted Tenancy: When HAP Contract is Executed	<u>Regulatory Authority</u> § 982.305(c)	<ul style="list-style-type: none"> <li>• Provides for HAP payments for contracts not executed within 60 days</li> <li>• PHA must not pay HAP to owner until HAP contract is executed</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		
HCV-5 Absence from Unit	<u>Regulatory Authority</u> § 982.312	<ul style="list-style-type: none"> <li>• Allows for PHA discretion on absences from units longer than 180 days</li> <li>• PHAs must not make HAP payments beyond</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		

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Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
		12/31/20 for units vacant more than 180 consecutive days			
HCV-6 Automatic Termination of HAP Contract	<u>Regulatory Authority</u> § 982.455	<ul style="list-style-type: none"> <li>Allows PHA to extend the period of time after the last HAP payment is made before the HAP contract terminates automatically.</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> </ul>		
HCV-7 Increase in Payment Standard During HAP Contract Term	<u>Regulatory Authority</u> § 982.505(c)(4)	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> </ul>		
HCV-8 Utility Allowance Schedule: Required Review and Revision	<u>Regulatory Authority</u> § 982.517	<ul style="list-style-type: none"> <li>Provides for delay in updating utility allowance schedule</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> </ul>		

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HCV-9 Homeownership Option: 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"> <li>• Waives the requirement for the family to obtain pre-assistance counseling</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		
HCV-10 Family Unification Program (FUP): FUP Youth Age Eligibility to Enter HAP Contract	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> <li>• Allows PHAs to increase age to 26 for foster youth initial lease up</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		
HCV-11 Family Unification Program (FUP): Length of Assistance for Youth	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> <li>• Allows PHAs to suspend terminations of assistance for FUP youth who will reach the 36-month limit between April 10, 2020, and December 31, 2020</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		
HCV-12 Family Unification Program (FUP): Timeframe for Referral	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> <li>• Allows PHAs to accept referrals of otherwise eligible youth who will leave foster care within 120 days</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		

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HCV-13 Homeownership: Maximum Term of Assistance	<u>Regulatory Authority</u> § 982.634(a)	<ul style="list-style-type: none"> <li>Allows a PHA to extend homeownership assistance for up to 1 additional year</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> </ul>		
HCV-14 Mandatory Removal of Unit from PBV HAP Contract	<u>Regulatory Authority</u> §§ 983.211(a); 983.258	<ul style="list-style-type: none"> <li>Allows a PHA to keep a PBV unit under contract for a period of time that extends beyond 180 from the last HAP but does not extend beyond December 31, 2020</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> </ul>		
PH-1 Fiscal Closeout of Capital Grant Funds	<u>Regulatory Authority</u> § 905.322(b)	<ul style="list-style-type: none"> <li>Extension of deadlines for ADCC and AMCC</li> </ul>	Varies by PHA		
PH-2 Total Development Costs	<u>Regulatory Authority</u> § 905.314(c) - (d)	<ul style="list-style-type: none"> <li>Waives the TDC and HCC limits permitting approval of amounts in excess of published TDC by 25% to 50% on a case by case basis</li> </ul>	Applies to development proposals submitted to HUD no later than December 31, 2021		

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PH-3 Cost and Other Limitations: Types of Labor	<u>Regulatory Authority</u> § 905.314(j)	<ul style="list-style-type: none"> <li>Allows for the use of force account labor for modernization activities in certain circumstances</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> </ul>		
PH-4 ACOP: Adoption of Tenant Selection Policies	<u>Regulatory Authority</u> § 960.202(c)(1)	<ul style="list-style-type: none"> <li>Establishes an alternative requirement that policies may be adopted without board approval until 3/31/21</li> <li>Any provisions adopted informally must be adopted formally by 6/30/21</li> </ul>	<ul style="list-style-type: none"> <li>3/31/21</li> <li>6/30/21</li> </ul>		
PH-5 Community Service and Self-Sufficiency Requirement (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"> <li>Temporarily suspends CSSR</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> </ul>		
PH-6 Energy Audits	<u>Regulatory Authority</u> § 965.302	<ul style="list-style-type: none"> <li>Allows for delay in due dates of energy audits</li> </ul>	<ul style="list-style-type: none"> <li>12/31/21</li> </ul>		

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PH-7 Over-Income Families	<u>Statutory Authority</u> Section 16(a)(5)  <u>Sub-regulatory Guidance</u> Housing Opportunity Through Modernization Act of 2016: Final Implementation of the Public Housing Income Limit 83 FR 35490, Notice PIH 2019-11	<ul style="list-style-type: none"> <li>Changes to timeframes for determination of over-income when a delay in the annual reexamination occurs as a result of adoption of waiver PH and HCV-2</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> </ul>		
PH-8 Resident Council Elections	<u>Regulatory Authority</u> § 964.130(a)(1)	<ul style="list-style-type: none"> <li>Provides for delay in resident council elections</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> </ul>		
PH-9 Review and Revision of Utility Allowance	<u>Regulatory Authority</u> § 965.507	<ul style="list-style-type: none"> <li>Provides for delay in updating utility allowance schedule</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> </ul>		
PH-10 Tenant Notifications for Changes to Project Rules and Regulations	<u>Regulatory Authority</u> § 966.5	<ul style="list-style-type: none"> <li>Advance notice not required except for policies related to tenant charges</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> </ul>		



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PH-11 Designated Housing Plan Renewals	<u>Statutory Authority</u> Section 7(f)	<ul style="list-style-type: none"> <li>Extends the Plan’s effective period through June 30, 2021 for Plans due to expire between July 2, 2020 and June 30, 2021</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> </ul>		
PH-12 Public Housing Agency Annual Self-Inspections	<u>Statutory Authority</u> Section 6(f)(3)  <u>Regulatory Authority</u> § 902.20(d)	<ul style="list-style-type: none"> <li>Waives the requirement that the PHA must inspect each project</li> </ul>	<ul style="list-style-type: none"> <li>12/31/20</li> </ul>		
PH-13 Over-Income Limit: Termination Requirement	<u>Statutory Authority</u> Section 16(a) as amended by section 103 of HOTMA  Implementation Notice: Housing Opportunity Through Modernization Act of 2016: Final Implementation of Public Housing Income Limit, 83 Fed. Reg. 35,490 (July 26, 2018)	<ul style="list-style-type: none"> <li>Waives the requirement that a family whose income has exceeded the over-income limit for the locality for two consecutive years be terminated within 6 months of the third income determination.</li> <li>As an alternative requirement, over-income families will remain public housing</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> </ul>		

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		households instead of being terminated and will be charged the applicable FMR as the family’s monthly rental amount.			
PH-14 Annual Choice of Rent	<u>Statutory Authority:</u> 42 USC 1437a(a)(2)(A)  <u>Regulatory Authority</u> § 960.253	<ul style="list-style-type: none"> <li>Allows families an additional opportunity to select an income-based or flat rent</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> </ul>		
11a PHAS	<u>Regulatory Authority</u> 24 CFR Part 902	<ul style="list-style-type: none"> <li>Allows for alternatives related to inspections</li> <li>PHA to retain prior year PHAS score unless requests otherwise</li> </ul>	HUD will resume issuing new PHAS scores starting with PHAs with FYE dates of 6/30/21		
11b SEMAP	<u>Regulatory Authority</u> 24 CFR Part 985	<ul style="list-style-type: none"> <li>PHA to retain prior year SEMAP score unless requests otherwise</li> </ul>	HUD will resume issuing new SEMAP scores starting with PHAs with FYE dates of 06/30/21		

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11b-1 SEMAP	<u>Regulatory Authority</u> § 985.105(d)	<ul style="list-style-type: none"> <li>Allows field offices to perform a remote SEMAP confirmatory review instead of an on-site confirmatory review before changing a PHA's rating from troubled to standard or high performer</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> </ul>		
11b-2 SEMAP	<u>Regulatory Authority</u> § 985.101(a)	<ul style="list-style-type: none"> <li>Waives the requirement for PHAs to submit an annual SEMAP certification in PIC within 60 days of FYE during the period of time that HUD will roll forward prior year SEMAP scores</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> </ul>		
11c Uniform Financial Reporting Standards; Filing of Financial Reports; Reporting Compliance Dates	<u>Regulatory Authority</u> §§ 5.801(c), 5.801(d)(1)	<ul style="list-style-type: none"> <li>Allows for extensions of financial reporting deadlines</li> </ul>	Varies by PHA FYE		

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12a PHA Reporting Requirements on HUD Form 50058	<u>Regulatory Authority</u> 24 CFR Part 908, § 982.158  <u>Sub-regulatory Guidance</u> Notice PIH 2011-65	<ul style="list-style-type: none"> <li>• Waives the requirement to submit 50058 within 60 days</li> <li>• Alternative requirement to submit within 90 days of the effective date of action</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/20</li> </ul>		
12b Designated Housing Plans: HUD 60-Day Notification	<u>Statutory Authority</u> Section 7(e)(1)	<ul style="list-style-type: none"> <li>• Allows for HUD to delay notification about designated housing plan</li> </ul>	<ul style="list-style-type: none"> <li>• 7/31/20</li> </ul>		
12c Extension of Deadline for Programmatic Obligation and Expenditure of Capital Funds	<u>Statutory Authority</u> Section 9(j)  <u>Regulatory Authority</u> § 905.306(d)(5)	<ul style="list-style-type: none"> <li>• Provides an 18-month extension</li> </ul>	For all open Capital Fund grants, an 18-month extension from the obligation and expenditure end dates in LOCCS as of April 10, 2020		
12d Section 6(j) 1- and 2-Year Substantial Improvement	<u>Statutory Authority</u> Section 6(j)(3)(B)(ii)	<ul style="list-style-type: none"> <li>• For PHAs designated as troubled prior to the date of this Notice that have not received a PHAS</li> </ul>	The period of availability for this waiver and alternative		

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Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
Requirements	<u>Regulatory Authority</u> 24 CFR § 902.75(d)	assessment for the first full fiscal year after the initial notice of the troubled designation, HUD will: (1) evaluate the 1-year substantial improvement benchmark based on the first released score for fiscal years ending on or after June 30, 2022; and, (2) toll the evaluation of the 2-year recovery benchmark to the next sequential fiscal year	requirement: (1) is effective on the date of this Notice; and, (2) will continue through June 30, 2023, at which time HUD will reevaluate any additional impacts of this waiver on any PHA in the process of being evaluated.		
MR-1 Family Income and Composition: Delayed Annual Examination	<u>Statutory Authority</u> Section 3(a)(1)  <u>Regulatory Authority</u> 24 CFR § 882.515(a)	<ul style="list-style-type: none"> <li>• Waives statutory and regulatory requirement to permit PHAs to delay annual reexaminations of Mod Rehab families</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		
MR-0 Family Income and Composition: Annual examination; Income	<u>Regulatory Authority:</u> §5.233(a)(2)  <u>Sub-regulatory Guidance</u>	<ul style="list-style-type: none"> <li>• Waives the requirements to use the income hierarchy</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		

**Attachment I: 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.)**

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
Verification Requirements	Notice PIH 2018-18	described by Notice PIH 2018-18 and will allow PHAs to forgo third-party income verification requirements for annual reexaminations, including the use of EIV, if the PHA wishes to conduct the annual reexam rather than delaying the family's annual reexam as permitted under MR-1			
MR-3 Family Income and Composition: Interim Examinations	<u>Statutory Authority</u> Section 3(a)(1)  <u>Regulatory Authority</u> 24 CFR §§ 5.233(a)(2), 882.515(b)  <u>Sub-regulatory Guidance</u> Notice PIH 2018-18	<ul style="list-style-type: none"> <li>• Waives requirements to use the income verification hierarchy as described by Notice PIH 2018-18. Allows PHAs to forgo third-party income verification</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		

**Attachment I: 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.)**

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
		<p>requirements for interim reexams, including the required use of EIV</p> <ul style="list-style-type: none"> <li>• During the allowable period of eligibility, PHAs may consider self-certification as the highest form of income verification to process interim reexams</li> </ul>			
<p>MR-4 Enterprise Income Verification (EIV) Monitoring</p>	<p><u>Regulatory Authority</u> § 5.233</p> <p><u>Sub-regulatory Guidance</u> Notice PIH 2018-18</p>	<ul style="list-style-type: none"> <li>• Waiving the mandatory EIV monitoring requirements.</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		
<p>MR-5 PHA Inspection Requirement: Annual Inspections</p>	<p><u>Regulatory Authority</u> § 882.516(b)</p>	<ul style="list-style-type: none"> <li>• Waives the annual inspection requirement and allows PHAs to delay annual inspections for Mod Rehab units</li> <li>• All delayed annual inspections must be</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		

**Attachment I: 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.)**

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
		completed as soon as reasonably possible but no later than one year after the date the annual inspection would have been required absent the waiver			
MR-6 Adjustment of Utility Allowance	<u>Regulatory Authority</u> § 882.510	<ul style="list-style-type: none"> <li>• Waives the requirement to allow PHAs to delay the review and update of utility allowances</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		
MS-1 Mainstream Initial Lease Term	<u>Statutory Authority</u> Section 8(o)(7)(A)  <u>Regulatory Authority</u> § 982.309(a)(2)(ii)	<ul style="list-style-type: none"> <li>• PHA may enter initial lease terms of less than one year regardless of whether the shorter lease term is a prevailing market practice</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		
MS-2 Mainstream Criminal Background Screening	<u>Statutory Authority</u> 42 U.S.C. 13663(a), 42 U.S.C. 13661	<ul style="list-style-type: none"> <li>• PHAs may establish, as an alternative requirement, screening</li> </ul>	<ul style="list-style-type: none"> <li>• 6/30/21</li> </ul>		



**Attachment I: 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.)**

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
	<u>Regulatory Authority</u> §§ CFR 5.856, 982.553(a)	requirements for applicants for Mainstream vouchers which are distinct from those in place for its HCV program in general			
MS-3 Mainstream Age Eligibility to Enter HAP Contract Statutory Authority	<u>Statutory Authority</u> 42 U.S.C. 8013(k)(2)	<ul style="list-style-type: none"> <li>As an alternative requirement, the PHA may choose to expand the definition of an eligible non-elderly family member to include those who were issued a voucher prior to turning 62 and were not yet 63 on the effective date of the HAP Contract</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> </ul>		

**Attachment II: Summary of IHBG and ICDBG Statutory and Regulatory Waivers and Alternative Requirements**

COVID-19 Statutory and Regulatory Waivers for ONAP programs		
Item	Statutory and Regulatory Waivers	Waiver/Alternative Requirement Summary
13a. Application Process for IHBG-CARES Grants and Indian Housing Plan (IHP) Requirements	Statutory Authority: Section 101(b), Section 102, and Section 103 of NAHASDA  Regulatory Authority: 24 C.F.R. §§ 1000.214; 1000.218;1000.220; 1000.224; 1000.226; 1000.228;1000.230; and 1000.232	<i>Abbreviated IHP to Receive IHBG-CARES Grant Funding:</i> Applicants for IHBG-CARES funding must submit an abbreviated IHP specifying how the funds will be used.
		<i>Recipients that did Not Submit an IHP in FY2020:</i> A Tribe or TDHE that did not submit a timely or compliant IHP in FY 2020 may still qualify for an IHBG-CARES grant.
		<i>IHP Certifications:</i> IHBG recipients that cannot provide HUD with IHP certifications may still submit an Abbreviated IHP provided an authorized official of the IHBG recipient provides a statement on inability to secure certifications.
		<i>Reprogramming of FY2020 IHBG Funding:</i> FY2020 IHBG funds may be reprogrammed to address COVID-19 through streamlined process.

**Attachment II: Summary of IHBG and ICDBG Statutory and Regulatory Waivers and Alternative Requirements**

13b. IHP Submission Deadline for Annual IHBG Formula Grants	Statutory Authority: Section 101(b) and 102(a) of NAHASDA,  Regulatory Authority: 24 CFR §§ 1000.214, 1000.216, 1000.225	IHP Submission Deadlines Extended	Original IHP Due Date	Extension
			1/17/2020	10/16/2020
			4/17/2020	10/16/2020
			7/18/2020	1/17/2021
13c. Annual Performance Report Submission Deadline	Statutory Authority: Sections 403 and 404 of NAHASDA, Regulatory Authority: 24 CFR § 1000.514	APR Submission Deadlines Extended	Original APR Due Date	Extension
			3/30/2020	9/27/2020
			6/29/2020 9/30/2020	12/30/2020 12/30/2020
13d. Income Verification	Regulatory Authority: 24 CFR § 1000.128	IHBG recipients may deviate from their current written admissions and occupancy policies, including allowing less frequent income recertifications, remote income verification, and self-certification over the phone or email.		
13e. Public Health Services	Statutory Authority: Section 202(3) of NAHASDA	Recipients may use IHBG-CARES funding to carry out a wide range of public health services.		

**Attachment II: Summary of IHBG and ICDBG Statutory and Regulatory Waivers and Alternative Requirements**

<p>13f. COVID-19-Related Assistance to Non-Low Income and Non-Native Families</p>	<p>Statutory Authority: Section 201(b) of NAHASDA, Regulatory Authority: 24 CFR §§ 1000.104, 1000.106, 1000.108, 1000.110, 1000.312, 1000.314, 1000.318</p>	<p>Recipients may use IHBG-CARES funding to prevent, prepare for, and respond to COVID-19 through certain limited activities that provide assistance to all affected and threatened people without regard to income limits or Indian status.</p>
<p>13g. Useful Life</p>	<p>Statutory Authority: Section 205 of NAHASDA, Regulatory Authority: 24 CFR §§ 1000.141, 1000.142, 1000.143, 1000.144, 1000.146, 1000.147</p>	<p>If the assistance is related to inhibiting the spread of COVID-19 to low-income Indian families and the Tribal community, Recipients may use IHBG-CARES funding to assist housing units without determining and maintaining affordability during their useful life.</p>
<p>13h. Total Development Cost (TDC) Limits</p>	<p>Regulatory Authority: 24 CFR §§ 1000.156, 1000.158, 1000.160, 1000.162</p>	<p>Recipients may exceed TDC by 20 percent without HUD approval for dwelling and non-dwelling units developed, acquired or assisted to prevent, prepare for, and respond to COVID-19.</p>
<p>13i. Prohibition Against Investment of CARES Act Grant Funds</p>	<p>Statutory Authority: Section 204(b) of NAHASDA, Regulatory Authority: 24 CFR § 1000.58</p>	<p>Recipients are prohibited from investing any IHBG funding provided under the CARES Act.</p>

**Attachment II: Summary of IHBG and ICDBG Statutory and Regulatory Waivers and Alternative Requirements**

<p>13j. IHBG-CARES Funds Not Counted in Undisbursed Funds Factor</p>	<p>Regulatory Authority: 24 CFR § 1000.342</p>	<p>IHBG-CARES funds will not count towards an IHBG recipient’s prior years’ undisbursed funds when applying the Undisbursed Funds Factor under the IHBG formula.</p>
<p>14a. Citizen Participation</p>	<p>Statutory Authority: Section 104 of the Housing and Community Development Act of 1974 (HCD Act)  Regulatory Authority: 24 CFR § 1003.604</p>	<p>Indian tribes are not required to hold one or more meetings to obtain the views of residents before applying for ICDBG-CARES grant funding or amending their FY 2019/2020 ICDBG grants to address COVID-19.</p>
<p>14b. Application Process for ICDBG-CARES Grants and Funding Criteria  Regulatory Authority: 24 CFR §§ 1003.400, 1003.401, 1003.402; Section I.A.1.b. of FY19/20 ICDBG Notice of Funding Availability (NOFA)</p>	<p><i>1) Criteria for Funding:</i> With respect to applications for ICDBG-CARES grants and FY 2019/2020 ICDBG Imminent Threat grants to address the COVID-19 crisis, the urgency and immediacy of the threat will be presumed.</p>	
	<p><i>2) Grant Ceilings:</i> Current grant ceilings are waived for ICDBG-CARES and will be set in an ICDBG-CARES Implementation Notice to be published in the very near future.</p>	
	<p><i>3) Reimbursement of Costs and Letter to Proceed:</i> ICDBG applicants and grantees to receive ICDBG-CARES grants do not have to demonstrate other Tribal funding sources cannot be made available to alleviate the threat and may use the funding to cover or reimburse costs to prevent, prepare for, and respond to COVID-19 without a Letter to Proceed from the area ONAP.</p>	

**Attachment II: Summary of IHBG and ICDBG Statutory and Regulatory Waivers and Alternative Requirements**

		<p><i>4) Availability of Funds:</i> If ICDBG-CARES grant funds are not awarded in a fiscal year, HUD reserves the right to adjust how funding is awarded to ensure needs of Tribes are met, including possibly setting aside a portion of funding to address the needs of Tribes with the greatest needs.</p>
<p>14c. Removal of Public Services 15 Percent Cap under FY 2019 and FY 2020 ICDBG Grants</p>	<p>Statutory Authority: Section 105 of the HCD Act; Regulatory Authority: 24 CFR § 1003.201(e); FY 19/20 ICDBG NOFA</p>	<p>HUD is eliminating the 15 percent cap on FY 2019/2020 ICDBG funding (both Single Purpose and Imminent Threat grants).</p>
<p>14d. Rental Assistance, Utility Assistance, Food, Clothing, and Other Emergency Assistance</p>	<p>Statutory Authority: Section 105 of the HCD Act; Regulatory Authority: 24 CFR § 1003.207(b)(4)</p>	<p>ICDBG grant funds may be used to provide emergency payments for low and moderate income individuals or families impacted by COVID-19 for items such as food, medicine, clothing, and other necessities, as well as utility payment assistance.</p>
<p>14e. Purchase of Equipment</p>	<p>Regulatory Authority: 24 CFR §§ 1003.207(b)(1); 1003.201(c)(1)(ii)</p>	<p>Grantees may use of ICDBG funds for the purchase of medical and personal protective equipment to prevent, prepare for, and respond to the COVID-19.</p>

**Attachment II: Summary of IHBG and ICDBG Statutory and Regulatory Waivers and Alternative Requirements**

<p>14f. Operating Expenses for Public Facilities</p>	<p>Regulatory Authority: 24 CFR § 1003.207(b)(2)</p>	<p>Grantees may use ICDBG funds to pay operating and maintenance expenses of any public facility, to the extent it is used for COVID-19-related purposes but not for staffing costs of public facilities.</p>
<p>14g. New Housing Construction by Tribes</p>	<p>Statutory Authority: Section 105 of the HCD Act, Regulatory Authority: 24 CFR § 1003.207(b)(3)</p>	<p>ICDBG grantees may use ICDBG funds to carry out new housing construction under certain conditions without having to use a CBDO.</p>

**St. Louis Housing Authority**

COVID-19 Statutory and Regulatory Waivers and Alternative Requirements for the Public Housing and Housing Choice Voucher Programs

**Tracking Sheet**

*\*\*Original waiver notice (PIH 2020-05) adopted effective April 10, 2020; PIH Notice 2021-14 Supersedes all previous waiver notices as of May 4, 2021*

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.**
PH and HCV-1 PHA 5-Year and Annual Plan Submission Dates: Significant Amendment Requirements	<u>Statutory Authority</u> Section 5A(a)(1), Section 5A(b)(1), Section 5A(g), Section 5A(h)(2) <u>Regulatory Authority</u> §§ 903.5(a)(3), 903.5(b)(3), 903.13(c), 903.21, 903.23	<ul style="list-style-type: none"> <li>Alternative dates for submission</li> <li>Changes to significant amendment process</li> </ul>	<ul style="list-style-type: none"> <li>Varies based on FYE</li> <li>12/31/20</li> </ul>	Yes	5/4/21
PH and HCV-2 Family Income and Composition: Delayed Annual Examinations	<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"> <li>Permits the PHA to delay the annual reexamination of income and family composition</li> <li>HCV PHAs must implement HCV-7 for impacted families if they implement this waiver</li> </ul>	<ul style="list-style-type: none"> <li>6/30/21</li> <li>All reexams due in CY20 must be completed by 12/31/20.</li> <li>Reexams due between 1/1/21 and 12/31/21 would need to be completed by 12/31/21.</li> </ul>	Yes	5/4/21



PH and HCV-3 Family Income and Composition: Annual Examination; Income Verification Requirements	<u>Regulatory Authority</u> §§ 5.233(a)(2), 960.259(c), 982.516(a) <u>Sub-regulatory Guidance Notice</u> PIH 2018-18	<ul style="list-style-type: none"> <li>• 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</li> <li>• PHAs that implement this waiver will be responsible for addressing material income discrepancies that may arise later</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/21</li> </ul>	Yes	5/4/21
PH and HCV-4 Family Income and Composition: Interim Examinations	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> §§ 5.233(a)(2), 982.516(c)(2), 960.257(a), (b) and (d), 960.259(c) <u>Sub-regulatory Guidance Notice</u> PIH 2018-18	<ul style="list-style-type: none"> <li>• Waives the requirement to use the income verification requirements, including the use of EIV, for interim reexaminations</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/21</li> </ul>	Yes	5/4/21
PH and HCV-5 Enterprise Income Verification (EIV) Monitoring	<u>Regulatory Authority</u> § 5.233 <u>Sub-regulatory Guidance Notice</u> PIH 2018-18	<ul style="list-style-type: none"> <li>• Waives the mandatory EIV monitoring requirements</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/21</li> </ul>	Yes	5/4/21

PH and HCV-6 Family Self- Sufficiency (FSS) Contract of Participation: Contract Extension	<u>Statutory Authority</u> Section 23(c)3 <u>Regulatory Authority</u> § 984.303(d)	<ul style="list-style-type: none"> <li>• FSS has a provision that indicates that PHAs can extend Participation Contracts by up to two years (beyond the original five) for “good cause.” PHAs should consider pandemic- related issues as an “automatic” good cause</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/21</li> </ul>	Yes	5/4/21
PH and HCV-7 Waiting List: Opening and Closing; Public Notice	<u>Regulatory Authority</u> § 982.206(a)(2) <u>Sub-regulatory Guidance</u> Notice PIH 2012-34	<ul style="list-style-type: none"> <li>• Waives public notice requirements for opening and closing waiting list</li> <li>• Requires alternative process</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/21</li> </ul>	Yes	5/4/21
PH and HCV-8 Eligibility Determination: Income Verification	<u>Regulatory Authority</u> §§ 960.259(c), 982.201(e) <u>Sub-regulatory Guidance</u> Notice PIH 2018-18	<ul style="list-style-type: none"> <li>• Waives the third-party income verification requirements for applicants, and will allow PHAs to consider self-certification as the highest form of income verification at admission</li> <li>• PHAs must review the EIV Income and IVT Reports to confirm/ validate family- reported income within 90 days</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/21</li> </ul>	Yes	5/4/21

<p>PH and HCV-9 Eligibility Determination: Social Security Number and Citizenship Verification</p>	<p><u>Statutory Authority</u> 42 USC 1436a(d)(2) <u>Regulatory Authority</u> §§ 5.216(b)(2), (g), (h), 5.218, 5.508(b)(2)(ii), (b)(3)(ii), (g) <u>Sub-regulatory Guidance</u> Notice PIH 2012-10</p>	<ul style="list-style-type: none"> <li>• Waives the requirements to obtain and verify social security number documentation and documentation evidencing eligible noncitizen status before admitting applicants to the HCV and Public Housing programs</li> <li>• PHAs may accept self-certification of date of birth and disability status if a higher level of verification is not immediately available.</li> <li>• Individuals admitted under this waiver must provide the required documentation within 90 days of admission to be eligible for continued assistance</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/21</li> </ul>	<p>Yes</p>	<p>5/4/21</p>
<p>HQS-1 Initial Inspection Requirements</p>	<p><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</p>	<ul style="list-style-type: none"> <li>• Changes initial inspection requirements, allowing for owner certification that there are no life-threatening deficiencies</li> <li>• Where self-certification was used, PHA must inspect the unit no later than 6/30/22</li> <li>• Will include reminder that HQS waiver does not include a waiver of 24 CFR 35.1215, visual assessment for deteriorated paint</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/21</li> <li>• 6/30/22</li> </ul>	<p>Yes</p>	<p>5/4/21</p>

<p>HQS-2: Project-Based Voucher (PBV) Pre-HAP Contract Inspections: PHA Acceptance of Completed Units</p>	<p><u>Statutory Authority</u>: Section 8(o)(8)(A) <u>Regulatory Authority</u>: §§ 983.103(b), 983.156(a)(1)</p>	<ul style="list-style-type: none"> <li>Changes inspection requirements, allowing for owner certification that there are no life-threatening deficiencies</li> <li>Where self-certification was used, PHA must inspect the unit no later than 6/30/22</li> </ul>	<ul style="list-style-type: none"> <li>12/31/21</li> <li>6/30/22</li> </ul>	<p>Yes</p>	<p>5/4/21</p>
<p>HQS-3 Initial Inspection: Non-Life-Threatening Deficiencies (NLT) Option</p>	<p><u>Statutory Authority</u> Section 8(o)(8)(A)(ii) <u>Sub-regulatory Guidance</u> HOTMA HCV Federal Register Notice January 18, 2017</p>	<ul style="list-style-type: none"> <li>Allows for extension of up to 30 days for owner repairs of non-life-threatening conditions</li> </ul>	<ul style="list-style-type: none"> <li>12/31/21</li> </ul>	<p>Yes</p>	<p>5/4/21</p>
<p>HQS-4 HQS Initial Inspection Requirement: Alternative Inspection Option</p>	<p><u>Statutory Authority</u> Section 8(o)(8)(A)(iii) <u>Sub-regulatory Guidance</u> HOTMA HCV Federal Register Notice January 18, 2017</p>	<ul style="list-style-type: none"> <li>Under Initial HQS Alternative Inspection Option - allows for commencement of assistance payments based on owner certification there are no life-threatening deficiencies</li> <li>Where self-certification was used, PHA must inspect the unit no later than 6/30/22</li> </ul>	<ul style="list-style-type: none"> <li>12/31/21</li> <li>6/30/22</li> </ul>	<p>Yes</p>	<p>5/4/21</p>

<p>HQS-5 HQS Inspection Requirement: Biennial Inspections</p>	<p><u>Statutory Authority</u> Section 8(o)(D) <u>Regulatory Authority</u> §§ 982.405(a), 983.103(d)</p>	<ul style="list-style-type: none"> <li>• Allows for delay in biennial inspections</li> <li>• PHAs must require owner certification there are no life-threatening deficiencies</li> <li>• PHAs must conduct all delayed biennial inspections from CY 2020 as soon as reasonably possible but no later than 6/20/22, and must conduct all delayed biennial inspections from CY 2021 as soon as reasonably possible but no later than 12/31/22</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/21</li> <li>• 6/30/22</li> </ul>	<p>Yes</p>	<p>5/4/21</p>
<p>HQS-6 HQS Interim Inspections</p>	<p><u>Statutory Authority</u> Section 8(o)(8)(F) <u>Regulatory Authority</u> §§ 982.405(g), 983.103(e)</p>	<ul style="list-style-type: none"> <li>• Waives the requirement for the PHA to conduct interim inspection and requires alternative method</li> <li>• Allows for repairs to be verified by alternative methods</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/21</li> </ul>	<p>Yes</p>	<p>5/4/21</p>
<p>HQS-7 PBV Turnover Unit Inspections</p>	<p><u>Regulatory Authority</u> § 983.103(c)</p>	<ul style="list-style-type: none"> <li>• Allows PBV turnover units to be filled based on owner certification there are no life-threatening deficiencies</li> <li>• Allows for delayed full HQS inspection NLT than 6/30/22</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/21</li> <li>• 6/30/22</li> </ul>	<p>Yes</p>	<p>5/4/21</p>

HQS-8: PBV HAP Contract: HQS Inspections to Add or Substitute Units	<u>Statutory Authority</u> Section 8(o)(8)(A) <u>Regulatory Authority</u> §§ 983.207(a), 983.207(b) <u>Sub-regulatory Guidance</u> HOTMA HCV Federal Register Notice January 18, 2017	<ul style="list-style-type: none"> <li>Allows for PBV units to be added or substituted in the HAP contract based on owner certification there are no life-threatening deficiencies</li> <li>Allows for delayed full HQS inspection NLT 6/30/22</li> </ul>	<ul style="list-style-type: none"> <li>12/31/21</li> <li>6/30/22</li> </ul>	Yes	5/4/21
HQS-9 HQS Quality Control Inspections	<u>Regulatory Authority</u> §§ 982.405(b), 983.103(e)(3)	<ul style="list-style-type: none"> <li>Provides for a suspension of the requirement for QC sampling inspections</li> </ul>	<ul style="list-style-type: none"> <li>12/31/21</li> </ul>	Yes	5/4/21
HQS-10 Housing Quality Standards: Space and Security	<u>Regulatory Authority</u> § 982.401(d)	<ul style="list-style-type: none"> <li>Waives the requirement that each dwelling unit have at least 1 bedroom or living/sleeping room for each 2 persons.</li> </ul>	Remains in effect one year from lease term or date of this Notice, whichever is longer	Yes	5/4/21
HQS-11 Homeownership Option: Initial HQS Inspection	<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"> <li>Waives the requirement to perform an initial HQS inspection in order to begin making homeownership assistance payments</li> <li>Requires family to obtain independent professional inspection</li> </ul>	<ul style="list-style-type: none"> <li>12/31/21</li> </ul>	Yes	5/4/21
HCV-1 Administrative Plan	<u>Regulatory Authority</u> § 982.54(a)	<ul style="list-style-type: none"> <li>Establishes an alternative requirement that policies may be adopted without board approval until 9/30/21</li> <li>Any provisions adopted informally must be adopted formally by 12/31/21</li> </ul>	<ul style="list-style-type: none"> <li>9/30/21</li> <li>12/31/21</li> </ul>	Yes	5/4/21

HCV-2 Information When Family is Selected: PHA Oral Briefing	<u>Regulatory Authority</u> §§ 982.301(a)(1), 983.252(a)	<ul style="list-style-type: none"> <li>• Waives the requirement for an oral briefing</li> <li>• Provides for alternative methods to conduct required voucher briefing</li> </ul>	• 12/31/21	Yes	5/4/21
HCV-3 Term of Voucher: Extensions of Term	<u>Regulatory Authority</u> § 982.303(b)(1)	<ul style="list-style-type: none"> <li>• Allows PHAs to provide voucher extensions regardless of current PHA policy</li> </ul>	• 12/31/21	Yes	5/4/21
HCV-4 PHA Approval of Assisted Tenancy: When HAP Contract is Executed	<u>Regulatory Authority</u> § 982.305(c)	<ul style="list-style-type: none"> <li>• Provides for HAP payments for contracts not executed within 60 days</li> <li>• PHA must not pay HAP to owner until HAP contract is executed</li> </ul>	• 12/31/21	Yes	5/4/21
HCV-5 Absence from Unit	<u>Regulatory Authority</u> § 982.312	<ul style="list-style-type: none"> <li>• Allows for PHA discretion on absences from units longer than 180 days</li> <li>• PHAs must not make HAP payments beyond 12/31/20 for units vacant more than 180 consecutive days</li> </ul>	• 12/31/21	Yes	5/4/21
HCV-6 Automatic Termination of HAP Contract	<u>Regulatory Authority</u> § 982.455	<ul style="list-style-type: none"> <li>• Allows PHA to extend the period of time after the last HAP payment is made before the HAP contract terminates automatically.</li> </ul>	• 12/31/21	Yes	5/4/21

HCV-7 Increase in Payment Standard During HAP Contract Term	<u>Regulatory Authority</u> § 982.505(c)(4)	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>12/31/21</li> </ul>	Yes	5/4/21
HCV-8 Utility Allowance Schedule: Required Review and Revision	<u>Regulatory Authority</u> § 982.517	<ul style="list-style-type: none"> <li>Provides for delay in updating utility allowance schedule</li> </ul>	<ul style="list-style-type: none"> <li>12/31/21</li> </ul>	Yes	5/4/21
HCV-9 Homeownership Option: 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"> <li>Waives the requirement for the family to obtain pre-assistance counseling</li> </ul>	<ul style="list-style-type: none"> <li>12/31/21</li> </ul>	Yes	5/4/21
HCV-10 Family Unification Program (FUP): FUP Youth Age Eligibility to Enter HAP Contract	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> <li>Allows PHAs to increase age to 26 for foster youth initial lease up</li> </ul>	<ul style="list-style-type: none"> <li>12/31/21</li> </ul>	Yes	5/4/21
HCV-11 Family Unification Program (FUP): Length of Assistance for Youth	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> <li>Allows PHAs to suspend terminations of assistance for FUP youth who will reach the 36-month limit between April 10, 2020, and December 31, 2020</li> </ul>	<ul style="list-style-type: none"> <li>12/31/21</li> </ul>	Yes	5/4/21
HCV-12 Family Unification Program (FUP): Timeframe for Referral	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> <li>Allows PHAs to accept referrals of otherwise eligible youth who will leave foster care within 120 days</li> </ul>	<ul style="list-style-type: none"> <li>12/31/21</li> </ul>	Yes	5/4/21



HCV-13 Homeownership: Maximum Term of Assistance	<u>Regulatory Authority</u> § 982.634(a)	<ul style="list-style-type: none"> <li>Allows a PHA to extend homeownership assistance for up to 1 additional year</li> </ul>	<ul style="list-style-type: none"> <li>12/31/21</li> </ul>	Yes	5/4/21
HCV-14 Mandatory Removal of Unit from PBV HAP Contract	<u>Regulatory Authority</u> §§ 983.211(a); 983.258	<ul style="list-style-type: none"> <li>Allows a PHA to keep a PBV unit under contract for a period of time that extends beyond 180 from the last HAP but does not extend beyond December 31, 2020</li> </ul>	<ul style="list-style-type: none"> <li>12/31/21</li> </ul>	Yes	5/4/21
HCV-15 Project-Based Voucher (PBV) and Enhanced Voucher (EV) Provisions on Under-Occupied Units	<u>Statutory Authority</u> 42 U.S.C. § 1437a(b)(3)(A) <u>Regulatory Authority</u> 24 CFR §§ 983.253(b), 983.260 <u>Sub-regulatory Guidance</u> Notice H 2019-9/PIH 2019-23, Notice PIH 2016- 02	<ul style="list-style-type: none"> <li>Allows a PHA to permit a family to initially lease an under-occupied PBV or RAD PBV unit (a unit that has more bedrooms than what the family qualifies for under PHA subsidy standards) under certain circumstances as described, and to allow for the continued occupancy of PBV and EV families already under a lease for an under-occupied PBV, RAD PBV, or EV unit.</li> </ul>	<ul style="list-style-type: none"> <li>12/31/21</li> </ul>	Yes	5/4/21

PH-1 Fiscal Closeout of Capital Grant Funds	<u>Regulatory Authority</u> § 905.322(b), 2 CFR § 200.344(a)	<ul style="list-style-type: none"> <li>• Extension of deadlines for closeout documents (ADCC and AMCC)</li> </ul>	Varies by PHA; For grants that were open on March 19, 2020, the deadline for submission of grant closeout documents (ADCCs and AMCCs) is extended from 120 days to one year.	Yes	5/4/21
PH-2 Total Development Costs	<u>Regulatory Authority</u> § 905.314(c) - (d)	<ul style="list-style-type: none"> <li>• Waives the TDC and HCC limits permitting approval of amounts in excess of published TDC by 25% to 50% on a case-by-case basis</li> </ul>	Applies to development proposals submitted to HUD no later than December 31, 2021	Yes	5/4/21
PH-3 Cost and Other Limitations: Types of Labor	<u>Regulatory Authority</u> § 905.314(j)	<ul style="list-style-type: none"> <li>• Allows for the use of force account labor for modernization without HUD approval regardless of whether the PHA is a high performer</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/21</li> </ul>	Yes	5/4/21
PH-4 ACOP: Adoption of Tenant Selection Policies	<u>Regulatory Authority</u> § 960.202(c)(1)	<ul style="list-style-type: none"> <li>• Establishes an alternative requirement that policies may be adopted without board approval until 9/30/21</li> <li>• Any provisions adopted informally must be adopted formally by 12/31/21</li> </ul>	<ul style="list-style-type: none"> <li>• 9/30/21</li> <li>• 12/31/21</li> </ul>	Yes	5/4/21

PH-5 Community Service and Self-Sufficiency Requirement (CSSR) – <b>superseded by 12.e.</b>	<u>Statutory Authority</u> Section 12(c) <u>Regulatory Authority</u> §§ 960.603(a) and 960.603(b)	• Temporarily suspends CSSR	• <b>N/A – this waiver is superseded by 12.e.</b>	Not Applicable	Not Applicable
PH-6 Energy Audits	<u>Regulatory Authority</u> § 965.302	• Allows for delay in due dates of energy audits	• 12/31/21	Yes	5/4/21
PH-7 Over-Income Families	<u>Statutory Authority</u> Section 16(a)(5) <u>Sub-regulatory Guidance</u> Housing Opportunity Through Modernization Act of 2016: Final Implementation of the Public Housing Income Limit 83 FR 35490, Notice PIH 2019-11	• Changes to timeframes for determination of over-income when a delay in the annual reexamination occurs as a result of adoption of waiver PH and HCV-2	• 12/31/21	Yes	5/4/21
PH-8 Resident Council Elections	<u>Regulatory Authority</u> § 964.130(a)(1)	• Provides for delay in resident council elections	• 12/31/21	Yes	5/4/21
PH-9 Review and Revision of Utility Allowance	<u>Regulatory Authority</u> § 965.507	• Provides for delay in updating utility allowance schedule	• 12/31/21	Yes	5/4/21
PH-10 Tenant Notifications for Changes to Project Rules and Regulations	<u>Regulatory Authority</u> § 966.5	• Advance notice not required except for policies related to tenant charges	• 12/31/21	Yes	5/4/21
PH-11 Designated Housing Plan Renewals	<u>Statutory Authority</u> Section 7(f)	• Extends the Plan’s effective period through June 30, 2021 for Plans due to expire between July 2, 2020 and June 30, 2021	• 6/30/21	Yes	5/4/21

PH-12 Public Housing Agency Annual Self- Inspections	<u>Statutory Authority</u> Section 6(f)(3) <u>Regulatory Authority</u> § 902.20(d)	<ul style="list-style-type: none"> <li>• Waives the requirement that the PHA must inspect each project</li> </ul>	• 12/31/20	Yes	5/4/21
PH-13 Over-Income Limit: Termination Requirement	<u>Statutory Authority</u> Section 16(a) as amended by section 103 of HOTMA Implementation Notice: Housing Opportunity Through Modernization Act of 2016: Final Implementation of Public Housing Income Limit, 83 Fed. Reg. 35,490 (July 26, 2018)	<ul style="list-style-type: none"> <li>• Waives the requirement that a family whose income has exceeded the over-income limit for the locality for two consecutive years be terminated within 6 months of the third income determination</li> <li>• As an alternative requirement, over- income families will remain public housing households instead of being terminated and will be charged the applicable FMR as the family’s monthly rental amount</li> </ul>	• 12/31/21	Yes	5/4/21
PH-14 Annual Choice of Rent	<u>Statutory Authority:</u> 42 USC 1437a(a)(2)(A) <u>Regulatory Authority</u> § 960.253	<ul style="list-style-type: none"> <li>• Allows a PHA to give families up to two opportunities to choose between a flat rent and an income-based rent within the same one-year period</li> </ul>	• 12/31/21	Yes	5/4/21
11a PHAS	<u>Regulatory Authority</u> 24 CFR Part 902	<ul style="list-style-type: none"> <li>• Allows for alternatives related to inspections</li> <li>• PHA to retain prior year PHAS score unless requests otherwise</li> </ul>	HUD will carry forward the most recent PHAS score on record for any PHAs with a fiscal year on or before 12/31/21	Yes	5/4/21

11b SEMAP	<u>Regulatory Authority</u> 24 CFR Part 985	<ul style="list-style-type: none"> <li>PHA to retain prior year SEMAP score unless requests otherwise</li> </ul>	HUD will carry forward the most recent SEMAP score on record for any PHAs with a fiscal year on or before 12/31/21	Yes	5/4/21
11b-1 SEMAP	<u>Regulatory Authority</u> § 985.105(d)	<ul style="list-style-type: none"> <li>Allows field offices to perform a remote SEMAP confirmatory review instead of an on-site confirmatory review before changing a PHA's rating from troubled to standard or high performer</li> </ul>	<ul style="list-style-type: none"> <li>12/31/21</li> </ul>	Yes	5/4/21
11b-2 SEMAP	<u>Regulatory Authority</u> § 985.101(a)	<ul style="list-style-type: none"> <li>Waives the requirement for PHAs to submit an annual SEMAP certification in PIC within 60 days of FYE during the period of time that HUD will roll forward prior year SEMAP scores</li> </ul>	<ul style="list-style-type: none"> <li>1/1/22</li> </ul>	Yes	5/4/21
11c Uniform Financial Reporting Standards: Filing of Financial Reports; Reporting Compliance Dates	<u>Regulatory Authority</u> §§ 5.801(c), 5.801(d)(1)	<ul style="list-style-type: none"> <li>Allows for extensions of financial reporting deadlines</li> </ul>	Varies by PHA FYE	Yes	5/4/21

12a PHA Reporting Requirements on HUD Form 50058	<u>Regulatory Authority</u> 24 CFR Part 908, § 982.158 <u>Sub-regulatory Guidance</u> Notice PIH 2011-65	<ul style="list-style-type: none"> <li>• Waives the requirement to submit 50058 within 60 days</li> <li>• Alternative requirement to submit within 90 days of the effective date of action</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/20</li> </ul>	Yes	5/4/21
12b Designated Housing Plans: HUD 60-Day Notification	<u>Statutory Authority</u> Section 7(e)(1)	<ul style="list-style-type: none"> <li>• Allows for HUD to delay notification about designated housing plan</li> </ul>	<ul style="list-style-type: none"> <li>• 7/31/20</li> </ul>	Yes	5/4/21
12c Extension of Deadline for Programmatic Obligation and Expenditure of Capital Funds	<u>Statutory Authority</u> Section 9(j) <u>Regulatory Authority</u> § 905.306(d)(5)	<ul style="list-style-type: none"> <li>• Provides a 24-month extension</li> </ul>	For all Capital Fund grants that were open on April 10, 2020, a 24-month extension from the obligation and expenditure end date in LOCCS as of April 10, 2020; For new Capital Fund grants opened between April 11, 2020 and December 31, 2020, a 24-month extension from the obligation and expenditure end dates in LOCCS as of December 31, 2020.	Yes	5/4/21

<p>12d Section 6(j) 1- and 2- Year Substantial Improvement Requirements</p>	<p><u>Statutory Authority</u> Section 6(j)(3)(B)(ii) <u>Regulatory Authority</u> 24 CFR § 902.75(d)</p>	<ul style="list-style-type: none"> <li>For PHAs designated as troubled prior to the date of this Notice that have not received a PHAS assessment for the first full fiscal year after the initial notice of the troubled designation, HUD will: (1) evaluate the 1-year substantial improvement benchmark based on the first released score for fiscal years ending on or after March 31, 2022 and, (2) toll the evaluation of the 2-year recovery benchmark to the next sequential fiscal year</li> </ul>	<p>The period of availability for this waiver and alternative requirement: (1) is effective on the date of this Notice; and (2) will continue through March 31, 2023, at which time HUD will reevaluate any additional impacts of this waiver on any PHA in the process of being evaluated.</p>	<p>Not Applicable</p>	<p>Not Applicable</p>
<p>12e Community Service and Self-Sufficiency Requirement (CSSR) suspension</p>	<p><u>Statutory Authority</u> Section 12(c) <u>Regulatory Authority</u> 24 CFR §§ 960.603(a), 960.603(b), 960.607, 966.4(l)(2)(iii)(D)</p>	<ul style="list-style-type: none"> <li>Waives the requirement that each non-exempt adult resident of public housing contribute 8 hours per month of community service and/or participation in an economic self- sufficiency program. This non-discretionary waiver also suspends enforcement of the requirement by all PHAs operating a public housing program</li> </ul>	<p>Effective for all annual reexaminations completed between the publication date of this notice through April 30, 2022.</p>	<p>Yes</p>	<p>5/4/21</p>

<p>MR-1 Family Income and Composition: Delayed Annual Examination</p>	<p><u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> 24 CFR § 882.515(a)</p>	<ul style="list-style-type: none"> <li>• Waives statutory and regulatory requirement to permit PHAs to delay annual reexaminations of Mod Rehab families</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/21</li> </ul>	<p>Yes</p>	<p>5/4/21</p>
<p>MR-0 Family Income and Composition: Annual examination; Income Verification Requirements</p>	<p><u>Regulatory Authority</u>: §5.233(a)(2) <u>Sub-regulatory Guidance</u> Notice PIH 2018-18</p>	<ul style="list-style-type: none"> <li>• Waives the requirements to use the income hierarchy described by Notice PIH 2018-18 and will allow PHAs to forgo third- party income verification requirements for annual reexaminations, including the use of EIV, if the PHA wishes to conduct the annual reexam rather than delaying the family’s annual reexam as permitted under MR-1</li> </ul>	<ul style="list-style-type: none"> <li>• 12/31/21</li> </ul>	<p>Yes</p>	<p>5/4/21</p>



MR-3 Family Income and Composition: Interim Examinations	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> 24 CFR §§ 5.233(a)(2), 882.515(b)  <u>Sub-regulatory Guidance</u> Notice PIH 2018-18	<ul style="list-style-type: none"> <li>• Waives requirements to use the income verification hierarchy as described by Notice PIH 2018-18. Allows PHAs to forgo third-party income verification requirements for interim reexams, including the required use of EIV</li> <li>• During the allowable period of eligibility, PHAs may consider self-certification as the highest form of income verification to process interim reexams</li> </ul>	• 12/31/21	Yes	5/4/21
MR-4 Enterprise Income Verification (EIV) Monitoring	<u>Regulatory Authority</u> § 5.233 <u>Sub-regulatory Guidance</u> Notice PIH 2018-18	<ul style="list-style-type: none"> <li>• Waiving the mandatory EIV monitoring requirements.</li> </ul>	• 12/31/21	Yes	5/4/21
MR-5 PHA Inspection Requirement: Annual Inspections	<u>Regulatory Authority</u> § 882.516(b)	<ul style="list-style-type: none"> <li>• Waives the annual inspection requirement and allows PHAs to delay annual inspections for Mod Rehab units</li> <li>• All delayed annual inspections must be completed as soon as reasonably possible but no later than one year after the date the annual inspection would have</li> </ul>	• 12/31/21	Yes	5/4/21
MR-6 Adjustment of Utility Allowance	<u>Regulatory Authority</u> § 882.510	<ul style="list-style-type: none"> <li>• Waives the requirement to allow PHAs to delay the review and update of utility allowances</li> </ul>	• 12/31/21	Yes	5/4/21

MS-1 Mainstream Initial Lease Term	<u>Statutory Authority</u> Section 8(o)(7)(A) <u>Regulatory Authority</u> § 982.309(a)(2)(ii)	<ul style="list-style-type: none"> <li>PHA may enter initial lease terms of less than one year regardless of whether the shorter lease term is a prevailing market practice</li> </ul>	<ul style="list-style-type: none"> <li>12/31/21</li> </ul>	Yes	5/4/21
MS-2 Mainstream Criminal Background Screening	<u>Statutory Authority</u> 42 U.S.C. 13663(a), 42 U.S.C. 13661 <u>Regulatory Authority</u> §§ CFR 5.856, 982.553(a)	<ul style="list-style-type: none"> <li>PHAs may establish, as an alternative requirement, screening requirements for applicants for Mainstream vouchers which are distinct from those in place for its HCV program in general</li> </ul>	<ul style="list-style-type: none"> <li>12/31/21</li> </ul>	Yes	5/4/21
MS-3 Mainstream Age Eligibility to Enter HAP Contract Statutory Authority	<u>Statutory Authority</u> 42 U.S.C. 8013(k)(2)	<ul style="list-style-type: none"> <li>As an alternative requirement, the PHA may choose to expand the definition of an eligible non-elderly family member to include those who were issued a voucher prior to turning 62 and were not yet 63 on the effective date of the HAP Contract</li> </ul>	<ul style="list-style-type: none"> <li>12/31/21</li> </ul>	Yes	5/4/21

**Section 6.0 (a) – PHA Plan Update – Plan Elements Revised**

**Item #1 – Eligibility Selection and Admissions Policies including Deconcentration and Wait List procedure**

**Wait List Re-Opening Projections for FY 2022**

SLHA’s wait list is a pool of applicants that have a need and demand for units by location. By analyzing trends of refusal and acceptance of unit offers, and the number of applicants by site, we can discern which developments are considered most and least desirable. Thus with this information we determine when to open and close our wait lists.

HUD AMP #	SLHA #	Development Name	Management Office Address	Re-opening Wait Lists Projections for FY 2022
AMP 000002	MO1-002	Clinton-Peabody	1401 LaSalle	YES
AMP 000010	MO1-010	James House	4310 St. Ferdinand	YES
AMP 000013B	MO1-013B	Euclid Plaza Apartments	5310 N. Euclid	NO
AMP 000017	MO1-017	West Pine	4490 West Pine	YES
AMP 000019	MO1-019	Parkview Apartments	4451 Forest Park	NO
AMP 000028	MO1-028	Badenhaus & Badenfest	8450 Gast Place	NO
AMP 000034	MO1-034	LaSalle Park	1001 Hickory	NO
AMP 000037	MO1-037	Cochran Plaza	1420 N 10 <sup>th</sup>	YES
AMP 000038	MO1-038	Armand & Ohio	2947,4951,4957 Armand	NO
AMP 000038	MO1-038	South Side Scattered Sites	3447 Lafayette	YES
AMP 000041	MO1-041	North Side Scattered Sites	1007 N. Taylor	YES
AMP 000044	MO1-044	Murphy Park I, II & III	1920 Cass	YES
AMP 000047	MO1-047	King Louis Square I & II	1524 South 13 <sup>th</sup> & 1129 Hickory	NO
AMP 000048	MO1-048	Les Chateaux	1330 Chouteau	YES
AMP 000050	MO1-050	Renaissance Place at Grand I, II & III	1001 N. Compton	YES
AMP 000052	MO1-052	King Louis III	1001 Hickory	YES
AMP 000054	MO1-054	Sr. Living at Ren. Pl.	3217 Martin Luther King	YES
AMP 000055	MO1-055	Gardens at Ren. Pl.	3117 Thomas	NO
AMP 000056	MO1-056	Cahill House	1919 O'Fallon	YES
AMP 000058	MO1-058	Cambridge Heights I & II	703 O'Fallon	NO
AMP 000061	MO1-061	Kingsbury Terrace	5655 Kingsbury	NO
AMP 000062	MO1-062	Sr. Living at Cambridge Heights	728 Biddle	YES
AMP 000063	MO1-063	Arlington Grove	5547 Martin Luther King	NO
AMP 000064	MO1-064	North Sarah I, II & III	1024 North Sarah	NO
AMP 000067	MO1-067	Preservation Square I	1406 N 16 <sup>th</sup>	NO
		Section 8 Wait List	3520 Page Blvd.	NO

**St. Louis Housing Authority**

**FY 2022 Annual Plan**

**ATTACHMENT #4**

**Section B.1 (c) – PHA Plan Update – Plan Elements Revised**

**Item 3 – Financial Resources**

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>1. Federal Grants (FFY 2021 grants)</b>		
a) Public Housing Operating Fund	11,796,598	PHA Operations
b) Public Housing Capital Fund Grant	8,312,009	Capital Improvements
c) Housing Choice Voucher/VASH Program	50,717,796	Housing Assistance Payments and Administrative Fees
d) MS5-Mainstream 5 Voucher Program	163,200	Housing Assistance Payments
e) EHV-Emergency Housing Voucher	89,784	Housing Assistance Payments
f) Resident Opportunity and Self-Sufficiency Grants (ROSS)	146,588	FFS Coordinator for Public Housing & S8 Program
Other Federal Grants (list below)		
<b>2. Prior Year Federal Grants (unobligated funds only) (list below)</b>		<i>As of 3/31/22</i>
FFY 2015-MO36R00150215	1,204,553	Replacement Housing
FFY 2016-MO36R00150116	341,960	Replacement Housing
FFY 2016-MO36R00150216	1,699,786	Replacement Housing
FFY 2017-MO36R00150117	265,348	Replacement Housing
FFY 2017-MO36R00150217	1,607,288	Replacement Housing
FFY 2019-MO36P00150119	3,257,273	Capital Improvements
FFY 2020-MO36P00150120	4,764,246	Capital Improvements
FFY 2020-MO36P00150121	7,480,809	Capital Improvements
ROSS 2015-MO001DOJ017A015	5,159	Juvenile Reentry Assistance
ROSS 2020-ROSS201427	263,679	ROSS Service Coordinator
Jobs-Plus Pilot Program	5,001	Jobs Plus Initiative
<b>3. Public Housing Dwelling Rental Income</b>		
<b>4. Other income (list below)</b>		
Interest on Investments	2,144	PHA Operations
Interest on Investments/Fraud Recovery	500	Housing Assistance
Other (Dividends/Insurance Proceeds)	84,300	PHA Operations
Other (Charges to Residents)	113,164	PHA Operations
<b>5. Non-federal sources (list below)</b>		
Interest on Investments	1,500	
Other (Space Rentals)	74,240	
<b>Total resources</b>	<b>95,558,413</b>	

PROPOSED FLAT RENT COMPARABLES  
FY 2022

Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% minus UA	80% FMR
							Increase
							No Increase
							Decrease
							2022 Proposed Flat Rent
<b><u>James House</u></b>							
0 bdrm	\$709	\$875	\$900	\$891	\$889	\$551	\$759
1 bdrm	\$764	\$875	\$781	\$954	\$870	\$596	\$814
<b><u>West Pine</u></b>							
1 bdrm	\$967	\$1,170	\$1,095	\$1,059	\$1,108	\$596	\$1,017
2 bdrm	\$1,125	\$1,075	\$1,177	\$995	\$1,082	\$758	\$1,082
<b><u>Parkview</u></b>							
0 bdrm	\$851	\$879	\$828	\$821	\$843	\$551	\$843
1 bdrm	\$1,038	\$766	\$1,130	\$1,011	\$969	\$596	\$969
<b><u>Kingsbury Terrace</u></b>							
1 bdrm*	\$524	\$1,043	\$1,018	\$993	\$1,018	\$596	\$524
2 bdrm*	\$616	\$1,275	\$1,238	\$1,339	\$1,284	\$758	\$616
<b><u>Euclid Plaza</u></b>							
0 bdrm	\$575	\$732	\$849	\$652	\$744	\$551	\$625
1 bdrm	\$635	\$670	\$735	\$670	\$692	\$596	\$685
2 bdrm	\$774	\$888	\$888	\$813	\$863	\$758	\$824
<b><u>Badenfest</u></b>							
1 bdrm	\$588	\$586	\$528	\$579	\$564	\$506	\$564
2 bdrm	\$728	\$611	\$770	\$789	\$723	\$648	\$723
<b><u>Badenhaus</u></b>							
0 bdrm	\$603	\$653	\$567	\$702	\$641	\$551	\$603
1 bdrm	\$603	\$609	\$579	\$579	\$589	\$596	\$596
<b><u>Cochran Plaza</u></b>							
2 bdrm twnhm	\$915	\$1,227	\$935	\$715	\$959	\$639	\$959
3 bdrm twnhm	\$1,019	\$1,114	\$1,457	\$1,396	\$1,322	\$845	\$1,069
4 bdrm twnhm	\$1,078	\$1,775	\$1,391	\$1,687	\$1,618	\$990	\$1,128
5 bdrm twnhm	\$1,214	\$1,298	\$1,498	\$1,519	\$1,438	\$1,145	\$1,264
6 bdrm twnhm	\$1,357	\$1,795	\$1,756	\$1,756	\$1,769	\$1,296	\$1,407

PROPOSED FLAT RENT COMPARABLES  
FY 2022

Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% minus UA	80% FMR
							Increase
							No Increase
							Decrease
							2022 Proposed Flat Rent
<b><u>LaSalle Park</u></b>							
2 bdrm	\$1,008	\$985	\$1,110	\$1,066	\$1,054	\$639	\$1,054
3 bdrm	\$1,175	\$970	\$1,677	\$1,084	\$1,244	\$845	\$1,225
4 bdrm	\$1,225	\$1,867	\$1,386	\$1,357	\$1,537	\$990	\$1,275
<b><u>Clinton Peabody</u></b>							
1 bdrm	\$875	\$960	\$910	\$1,242	\$1,037	\$496	\$925
2 bdrm	\$1,050	\$1,263	\$1,062	\$1,205	\$1,177	\$639	\$1,100
3 bdrm	\$1,125	\$1,254	\$1,092	\$1,664	\$1,337	\$845	\$1,175
4 bdrm	\$1,175	\$1,587	\$1,302	\$1,771	\$1,553	\$990	\$1,225
5 bdrm	\$1,225	\$1,857	\$1,600	\$1,638	\$1,698	\$1,145	\$1,275
<b><u>Lafayette Apartments</u></b>							
0 bdrm	\$825	\$810	\$914	\$850	\$858	\$551	\$858
1 bdrm	\$865	\$901	\$983	\$934	\$939	\$596	\$915
<b><u>California Gardens</u></b>							
0 bdrm	\$586	\$405	\$677	\$676	\$586	\$551	\$586
1 bdrm	\$647	\$495	\$596	\$850	\$647	\$596	\$647
<b><u>Armand &amp; Ohio</u></b>							
3 bdrm	\$1,012	\$1,267	\$994	\$1,089	\$1,117	\$837	\$1,062
5 bdrm twnhm	\$1,225	\$1,528	\$1,926	\$1,533	\$1,662	\$1,134	\$1,275
<b><u>Lafayette Town</u></b>							
1 bdrm	\$848	\$817	\$790	\$946	\$851	\$510	\$851
2 bdrm	\$975	\$1,094	\$1,127	\$781	\$1,001	\$656	\$1,001
3 bdrm	\$1,125	\$1,241	\$1,262	\$1,652	\$1,385	\$868	\$1,175
<b><u>Tiffany Turnkey</u></b>							
1 bdrm	\$900	\$737	\$742	\$882	\$787	\$510	\$787
2 bdrm	\$957	\$1,075	\$890	\$905	\$957	\$656	\$957
<b><u>Folsom</u></b>							
2 bdrm	\$574	\$831	\$834	\$957	\$874	\$649	\$624
3 bdrm	\$1,037	\$1,012	\$892	\$1,207	\$1,037	\$860	\$1,037
4 bdrm	\$1,175	\$1,088	\$1,093	\$1,374	\$1,185	\$1,008	\$1,185

PROPOSED FLAT RENT COMPARABLES  
FY 2022

							80% FMR Increase No Increase Decrease
Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% minus UA	2022 Proposed Flat Rent
<b><u>Marie Fanger</u></b>							
2 bdrm	\$1,011	\$1,176	\$1,131	\$1,113	\$1,140	\$649	\$1,061
3 bdrm	\$1,125	\$1,219	\$1,214	\$1,298	\$1,244	\$860	\$1,175
4 bdrm	\$1,125	\$1,417	\$1,402	\$1,120	\$1,313	\$1,008	\$1,175
<b><u>South Broadway</u></b>							
3 bdrm	\$1,000	\$1,077	\$990	\$1,212	\$1,093	\$868	\$1,050
<b><u>McMillan Manor</u></b>							
3 bdrm	\$1,020	\$1,236	\$1,246	\$1,074	\$1,185	\$845	\$1,020
4 bdrm	\$1,175	\$1,855	\$1,657	\$1,455	\$1,656	\$990	\$1,225
<b><u>McMillan Manor II</u></b>							
3 bdrm	\$1,020	\$1,236	\$1,246	\$1,074	\$1,185	\$837	\$1,070
4 bdrm	\$1,175	\$1,855	\$1,657	\$1,455	\$1,656	\$980	\$1,225
<b><u>Samuel Shepard</u></b>							
2 bdrm	\$759	\$1,055	\$910	\$968	\$978	\$649	\$809
3 bdrm	\$1,000	\$1,018	\$1,003	\$1,625	\$1,215	\$860	\$1,050
4 bdrm	\$1,107	\$2,217	\$991	\$1,125	\$1,444	\$1,008	\$1,157
<b><u>Page Manor</u></b>							
3 bdrm	\$845	\$866	\$630	\$530	\$675	\$845	\$845
4 bdrm	\$990	\$813	\$693	\$1,086	\$864	\$990	\$990
<b><u>Hodiamont</u></b>							
2 bdrm	\$734	\$776	\$848	\$579	\$734	\$656	\$734
3 bdrm	\$868	\$800	\$801	\$836	\$812	\$868	\$868
4 bdrm	\$1,104	\$1,598	\$964	\$1,027	\$1,196	\$1,018	\$1,154
<b><u>Towne XV</u></b>							
3 bdrm	\$987	\$774	\$947	\$1,524	\$1,082	\$849	\$1,037
<b><u>Cupples</u></b>							
3 bdrm	\$860	\$660	\$780	\$733	\$724	\$860	\$860
4 bdrm	\$1,008	\$924	\$1,054	\$967	\$982	\$1,008	\$1,008

PROPOSED FLAT RENT COMPARABLES

FY 2022

							80% FMR Increase No Increase Decrease
Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% minus UA	2022 Proposed Flat Rent
<b>Walnut Park</b>							
3 bdrm	\$816	\$872	\$817	\$759	\$816	\$845	\$845
5 bdrm	\$1,230	\$1,153	\$1,319	\$1,253	\$1,242	\$1,145	\$1,242
<b>Lookaway</b>							
3 bdrm	\$1,045	\$1,022	\$1,086	\$1,026	\$1,045	\$845	\$1,045
4 bdrm	\$1,133	\$1,094	\$1,202	\$1,102	\$1,133	\$990	\$1,133
<b>King Louis Square III</b>							
1 bdrm garden	\$749	\$985	\$1,035	\$1,110	\$1,043	\$506	\$799
3 bdrm twnhm	\$1,050	\$1,283	\$1,309	\$970	\$1,187	\$828	\$1,100
4 bdrm twnhm	\$1,075	\$1,249	\$1,249	\$1,249	\$1,249	\$962	\$1,125
<b>Murphy Park I</b>							
2 bdrm garden*	\$964	\$871	\$825	\$1,107	\$934	\$656	\$964
2 bdrm twnhm*	\$964	\$995	\$995	\$995	\$995	\$639	\$964
3 bdrm garden*	\$1,114	\$871	\$1,008	\$1,107	\$995	\$868	\$1,114
3 bdrm twnhm*	\$1,114	\$1,295	\$1,320	\$1,295	\$1,303	\$845	\$1,114
4 bdrm twnhm*	\$1,243	\$1,567	\$1,550	\$1,178	\$1,432	\$990	\$1,243
5 bdrm twnhm - PH**	\$1,325	\$1,817	\$1,817	\$1,817	\$1,817	\$1,145	\$1,375
6 bdrm twnhm - PH**	\$1,325	\$2,083	\$2,083	\$2,083	\$2,083	\$1,296	\$1,375
<b>Murphy Park II</b>							
2 bdrm garden*	\$852	\$871	\$825	\$1,107	\$934	\$656	\$902
2 bdrm twnhm*	\$852	\$995	\$995	\$995	\$995	\$639	\$902
3 bdrm garden*	\$942	\$871	\$1,008	\$1,107	\$995	\$868	\$992
3 bdrm twnhm*	\$977	\$1,295	\$1,295	\$1,295	\$1,295	\$845	\$1,027
4 bdrm twnhm*	\$1,154	\$1,567	\$1,567	\$1,567	\$1,567	\$990	\$1,204
<b>Murphy Park III</b>							
2 bdrm garden*	\$872	\$871	\$825	\$1,107	\$934	\$656	\$872
2 bdrm twnhm*	\$880	\$1,025	\$1,025	\$1,025	\$1,025	\$639	\$880
3 bdrm garden*	\$946	\$871	\$1,008	\$1,107	\$995	\$868	\$946
3 bdrm twnhm*	\$946	\$1,295	\$1,295	\$1,295	\$1,295	\$845	\$946
4 bdrm twnhm - PH**	\$1,222	\$1,577	\$1,536	\$1,577	\$1,563	\$990	\$1,272
5 bdrm twnhm - PH**	\$1,365	\$1,841	\$1,841	\$1,824	\$1,835	\$1,145	\$1,415
6 bdrm twnhm - PH**	\$1,381	\$2,083	\$2,083	\$2,083	\$2,083	\$1,296	\$1,431



PROPOSED FLAT RENT COMPARABLES  
FY 2022

							80% FMR Increase No Increase Decrease
Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% minus UA	2022 Proposed Flat Rent
<b><u>Renaissance PI @ Grand</u></b>							
1 bdrm garden*	\$708	\$717	\$787	\$670	\$725	\$510	\$708
2 bdrm garden*	\$849	\$1,089	\$1,079	\$1,089	\$1,086	\$656	\$849
2 bdrm twnhm*	\$849	\$1,015	\$1,153	\$1,172	\$1,113	\$639	\$849
3 bdrm twnhm - PH**	\$1,060	\$1,199	\$1,367	\$1,274	\$1,280	\$845	\$1,110
4 bdrm twnhm - PH**	\$1,125	\$1,371	\$1,550	\$1,496	\$1,472	\$990	\$1,175
5 bdrm twnhm - PH**	\$1,255	\$1,774	\$2,053	\$1,757	\$1,861	\$1,145	\$1,305
<b><u>Renaissance PI @ Grand II</u></b>							
1 bdrm garden*	\$708	\$717	\$787	\$670	\$725	\$510	\$708
2 bdrm garden*	\$830	\$1,089	\$1,079	\$1,089	\$1,086	\$656	\$830
2 bdrm twnhm*	\$830	\$1,015	\$1,153	\$1,172	\$1,113	\$639	\$830
3 bdrm twnhm*	\$959	\$1,199	\$1,367	\$1,274	\$1,280	\$845	\$959
4 bdrm twnhm - PH**	\$1,125	\$1,371	\$1,550	\$1,496	\$1,472	\$990	\$1,175
5 bdrm twnhm - PH**	\$1,274	\$1,774	\$2,053	\$1,757	\$1,861	\$1,145	\$1,324
<b><u>Renaissance PI @ Grand III</u></b>							
1 bdrm garden*	\$658	\$717	\$787	\$670	\$725	\$510	\$658
2 bdrm garden*	\$772	\$1,089	\$1,079	\$1,089	\$1,086	\$656	\$772
2 bdrm twnhm*	\$823	\$1,015	\$1,153	\$1,172	\$1,113	\$639	\$823
3 bdrm twnhm*	\$948	\$1,199	\$1,367	\$1,274	\$1,280	\$845	\$948
4 bdrm twnhm - PH**	\$1,160	\$1,371	\$1,550	\$1,496	\$1,472	\$990	\$1,210
5 bdrm twnhm - PH**	\$1,229	\$1,774	\$2,053	\$1,757	\$1,861	\$1,145	\$1,279
<b><u>Gardens @ Renaissance</u></b>							
1 bdrm garden*	\$744	\$872	\$687	\$594	\$718	\$596	\$744
2 bdrm garden - PH**	\$882	\$919	\$1,002	\$725	\$882	\$758	\$882
<b><u>Senior Living @ Renaissnace</u></b>							
1 bdrm garden*	\$746	\$837	\$695	\$889	\$807	\$596	\$746
2 bdrm garden - PH**	\$922	\$1,070	\$725	\$971	\$922	\$758	\$922

PROPOSED FLAT RENT COMPARABLES  
FY 2022

Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% FMR	
						80% minus UA	Increase No Increase Decrease
							2022 Proposed Flat Rent
<b>King Louis Square</b>							
1 bdrm garden*	\$531	\$576	\$720	\$630	\$642	\$510	\$531
2 bdrm grdn/twnhm*	\$663	\$1,095	\$1,120	\$1,107	\$1,107	\$639	\$663
3 bdrm grdn/twnhm*	\$777	\$1,174	\$1,523	\$1,304	\$1,334	\$845	\$777
4 bdrm twnhm - PH**	\$1,108	\$1,268	\$1,418	\$1,379	\$1,355	\$990	\$1,158
<b>King Louis Square II (Old Frenchtown)</b>							
1 bdrm garden*	\$572	\$753	\$989	\$752	\$831	\$506	\$572
2 brdm garden*	\$704	\$1,150	\$1,150	\$1,190	\$1,163	\$648	\$704
3 bdrm twnhm*	\$830	\$1,002	\$1,691	\$1,761	\$1,485	\$828	\$830
<b>LesChateaux</b>							
1 bdrm	\$654	\$1,104	\$1,060	\$1,202	\$1,122	\$596	\$704
2 bdrm	\$817	\$1,025	\$1,235	\$1,378	\$1,213	\$758	\$867
<b>Cahill House</b>							
1 bdrm garden*	\$732	\$927	\$1,041	\$926	\$965	\$596	\$732
2 brdm garden - PH**	\$817	\$723	\$769	\$1,044	\$845	\$758	\$845
<b>Cambridge Heights I</b>							
1 bdrm garden*	\$583	\$585	\$813	\$895	\$764	\$506	\$583
2 brdm garden*	\$715	\$974	\$648	\$707	\$776	\$648	\$715
2 bdrm twnhm*	\$772	\$830	\$830	\$1,054	\$905	\$626	\$772
3 bdrm twnhm*	\$843	\$1,386	\$865	\$1,435	\$1,229	\$828	\$843
4 bdrm twnhm - PH**	\$1,175	\$1,484	\$1,084	\$1,484	\$1,351	\$962	\$1,175
5 bdrm twnhm - PH**	\$1,240	\$1,312	\$1,762	\$1,312	\$1,462	\$1,110	\$1,240
<b>Cambridge Heights II</b>							
1 bdrm garden*	\$606	\$858	\$637	\$895	\$797	\$506	\$606
2brdm garden*	\$786	\$974	\$948	\$762	\$895	\$648	\$786
2 bdrm twnhm*	\$812	\$830	\$830	\$1,054	\$905	\$626	\$812
3 bdrm twnhm*	\$910	\$1,386	\$1,281	\$1,225	\$1,297	\$828	\$910
4 bdrm twnhm - PH**	\$1,175	\$1,094	\$1,094	\$1,484	\$1,224	\$962	\$1,224
5 bdrm twnhm - PH**	\$1,240	\$1,733	\$1,312	\$1,473	\$1,506	\$1,110	\$1,290

PROPOSED FLAT RENT COMPARABLES

FY 2022

							80% FMR Increase No Increase Decrease
Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% minus UA	2022 Proposed Flat Rent
<b>Cambridge Senior</b>							
1 bdrm garden*	\$667	\$689	\$740	\$848	\$759	\$596	\$667
2 brdm garden	\$817	\$1,059	\$1,047	\$845	\$984	\$758	\$867
<b>Arlington Grove</b>							
2 brdm twnhm*	\$749	\$881	\$720	\$959	\$853	\$632	\$749
3 brdm twnhm*	\$856	\$1,126	\$951	\$910	\$996	\$837	\$856
<b>North Sarah</b>							
1 bdrm garden*	\$640	\$921	\$913	\$876	\$903	\$505	\$640
2 brdm twnhm*	\$749	\$1,510	\$1,432	\$1,245	\$1,396	\$632	\$749
3 brdm twnhm*	\$855	\$1,679	\$1,972	\$1,786	\$1,812	\$837	\$855
<b>North Sarah II</b>							
1 bdrm garden*	\$600	\$931	\$921	\$833	\$895	\$505	\$600
2 brdm twnhm*	\$700	\$1,261	\$1,376	\$1,256	\$1,298	\$632	\$700
3 brdm twnhm*	\$800	\$1,560	\$1,681	\$1,788	\$1,676	\$837	\$800
<b>North Sarah III</b>							
1 bdrm garden*	\$600	\$957	\$956	\$940	\$951	\$505	\$600
2 brdm twnhm*	\$700	\$1,485	\$1,510	\$952	\$1,316	\$632	\$700
3 brdm twnhm*	\$800	\$1,679	\$1,552	\$1,189	\$1,473	\$837	\$800
<b>Preservation Square I</b>							
2 brdm garden*		\$1,537	\$1,538	\$1,255	\$1,443	\$648	\$808
2 brdm twnhm*		\$1,066	\$858	\$1,053	\$992	\$650	\$905
3 brdm garden*		\$1,992	\$1,396	\$1,596	\$1,661	\$852	\$1,019
* Tax Credit Max ** PH Unit, not Tax Credit							

**St. Louis Housing Authority**  
**FY 2022 Annual Plan**

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**ATTACHMENT #6**

**Section B.1 (b) – PHA Plan Update – Plan Elements Revised**

**Item 5 – Operations and Management**

**Table of HUD Programs Under PHA Management**

Program Name	Families Served at Fiscal Year Beginning 10/01/2021	Expected Turnover
Public Housing	2516	444
Section 8 Vouchers	6447	69
Section 8 Certificates	N/A	N/A
Section 8 Mod Rehab	N/A	N/A
Special Purpose Section 8 Certificates/Vouchers (list individually) <b>Veterans Affairs Supportive Housing Program (VASH)</b>	258	6
Public Housing Drug Elimination Program (PHDEP)	N/A	N/A
Other Federal Programs(list individually)	N/A	N/A

**St. Louis Housing Authority**  
**FY 2022 Annual Plan**

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**ATTACHMENT #7**

**Section B.1 (b) – PHA Plan Update – Plan Elements Revised**

**Item 7 – Homeownership**

**Homeownership Program information is located in Attachment #11-New Activities (page 3)**

**St. Louis Housing Authority**  
**FY 2022 Annual Plan**

**ATTACHMENT #8**

**Section B.1 (b) – Revisions of PHA Plan Elements**

**Item 8 - Community Service and Self-Sufficiency Programs:**

The Authority’s Admissions and Continued Occupancy Policy (ACOP) contain policies that comply with the requirements of community service and treatment of income changes resulting from welfare program requirements for public housing residents.

ROSS Service Coordinator Program Participation Year Ending (March 31, 2022)			
	Required Participants*	Enrolled Participants	Year Ending Totals
Service Coordinators	≥ last year’s total	85	5 forfeitures 59 removals

FSS Program Participation Year Ending (March 31, 2022)			
	Required Participants*	Enrolled Participants	Year Ending Totals
Public Housing FSS	75	31 total 13 active	2 graduations 6 forfeitures
HCV - FSS	21	55 total 15 active	4 graduates 2 forfeitures

Average monthly escrow:      Public Housing- \$154.06                      HCV- \$126.78  
Average yearly escrow:        Public Housing- \$5,521.71                      HCV- \$4,566.36

\*Each quarter, the total number of new clients must be ≥ 5% of total participants (for ROSS Service Coordinators & FSS-PH **ONLY**. FSS-HCV has a HUD required amount; see above). Below is a list of community partners working with the Resident Initiatives Department.

## Services and Programs

Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/ specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)
<b>Education/Literacy</b> City of St. Louis Office of Financial Empowerment Financial Literacy	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
<b>Education/Literacy</b> Gateway EITC Community Coalition Tax Preparation	Open to All	Referrals	Resident Initiatives Department FSS Coordinators	Public Housing and Housing Choice Voucher Residents
<b>Education/Literacy</b> Lifewise Financial Stability	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
<b>Education/Literacy</b> Providence Bank Financial Literacy	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
<b>Education/Literacy</b> Regions Bank	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
<b>Education/Literacy</b> St. Louis Community College Upward Bound College Prep Program	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
<b>Education/Literacy</b> St. Louis Public Schools Adult Education/GED	Open to All	Referrals	Via Referrals from Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
<b>Education/Literacy</b> TRIO Education Opportunity Centers Education Assistance	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
<b>Employment/Job Training</b> Employment Connection Job Development and Placement Services, Employment Training	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
<b>Employment/Mentoring</b> Father's Support Center Legal Clinic Youth Leadership	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents

<b>Employment/Job Training</b> MET (Missouri Employment Training) Center Employment Training	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
<b>Employment/Job Training</b> Urban League Employment Training	Open to All	Walk-Ins	Resident Initiatives Department Program	Public Housing and Housing Choice Voucher Residents
<b>Employment/Job Training</b> Worknet Employment Training	25 Adults	Site Based Recruitment & Referrals	Resident Initiatives Department Program	Clinton Peabody Public Housing Residents
<b>Family Life Skills Training and Youth Services</b> People's Community Action Agency After School Tutoring Interpersonal Skills Development, Youth Mentoring Computer Usage	Referral Walk-ins	Referrals	PH FSS Coordinator Housing Choice Voucher FSS Coordinator Service Coordinators	Public Housing and Housing Choice Voucher Residents
<b>Family Life Skills Training and Youth Services</b> Places for People Parenting Training and Interpersonal Skills Development	Referrals	Referrals	Resident Initiatives Department Program	Public Housing and Housing Choice Voucher Residents
<b>Family Life Skills Training</b> University of Missouri Extension Urban Family and Consumer Sciences Programs	Open to All	Referrals	PH FFS Coordinator Housing Choice Voucher FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
<b>Health and Wellness Services</b> Affinia Healthcare Community Healthcare Services	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services & FSS Coordinators Service Coordinators	Public Housing Elderly/Disabled & Family Residents
<b>Health and Wellness Services</b> American Lung Association Health Education	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services & FSS Coordinators Service Coordinators	Public Housing Elderly/Disabled & Family Residents Housing Choice Voucher Residents
<b>Health and Wellness Services</b> Behavioral Health Response (BHR) Mental Health Services	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services & FSS Coordinators Service Coordinators	Public Housing Elderly/Disabled & Family Residents
<b>Health and Wellness Services</b> BJC Hospital/Siteman Cancer Center Mammography Screening & Education	Open to All	Referrals	Via referrals Elderly/Disabled Services & FSS Coordinators,	Public Housing Elderly/Disabled Residents, Housing



			Service Coordinators	Choice Voucher Residents
<b>Health and Wellness Services</b> CHIPS Health and Wellness Community Health Center	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services & FSS Coordinators Service Coordinators	Public Housing Elderly/Disabled Residents & Family Residents
<b>Health and Wellness Services</b> Dental Plaza Dental Care	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services & FSS Coordinators Service Coordinators	Public Housing Elderly/Disabled & Family Residents
<b>Health and Wellness Services</b> Gateway to Better Health Health Insurance	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services & FSS Coordinators Service Coordinators	Public Housing Elderly/Disabled & Family Residents
<b>Health and Wellness Services</b> Institute of Family Medicine Mental Health Services	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services & FSS Coordinators	Public Housing Elderly/Disabled & Family Residents
<b>Health and Wellness Services</b> Lincoln University Extension Center Education and Health Services	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services & FSS Coordinators	Public Housing and Housing Choice Voucher Residents
<b>Health and Wellness Services</b> Mental Health America of Eastern MO	Open to All	Referrals	Via referrals FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
<b>Health and Wellness Services</b> Missouri Department of Mental Health Mental Health Services VITAS Healthcare	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services	Public Housing Elderly/Disabled Residents & Family Residents
<b>Health and Wellness Services</b> Missouri Home Health Rehabilitation Services	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services	Public Housing Elderly/Disabled Residents
<b>Health and Wellness Services</b> St. Louis Area Agency on Aging Meals on Wheels	Open to All Elderly/ Disabled Residents	Referrals	Via referrals Coordinator Elderly/Disabled Services	Public Housing Elderly/Disabled Residents
<b>Health and Wellness Services</b> St. Louis School of Pharmacy Pharmacy Assistance	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services	Public Housing Elderly/Disabled Residents
<b>Health and Wellness Services</b> UMSL School of Nursing Elder Health Care	Open to All	Referrals	Via referrals Coordinator	Public Housing Elderly/Disabled Residents

Cambridge Heights, Cahill House, West Pine			Elderly/Disabled Services & FSS Coordinator	
<b>Health and Wellness Services</b> Washington University Goldfarb School of Nursing Elder Health Care Parkview and West Pine Developments	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services	Public Housing Elderly/Disabled Residents & Family Residents
<b>Health and Wellness Services</b> We Care Mobile Dental Dental Care	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services & FSS Coordinator	Public Housing Elderly/Disabled Residents & Family Residents
<b>Health and Wellness Services</b> Community Wellness Project Health Care	Clinton- Peabody Only	Site Based Walk-ins Recruitment Referrals	Program Staff Service Coordinator FSS Coordinator	Clinton Peabody Public Housing Residents
<b>Health and Wellness Services</b> Progress Eyecare Vision Care	Elderly/ Disabled Residents	Walk-Ins Referrals Recruitment	Elderly/Disabled Services Coordinator	Public Housing and Housing Choice Voucher Residents
<b>Youth Services</b> City Faces After School Program Tutoring, Mentoring, Art, Girl Scouts and Boy Scouts	Open to Ages (5-11) (12-18)	Referrals Recruitment Walk-ins	Resident Initiatives Department Al Chappelle Community Center	Public Housing Residents
<b>Youth Services</b> Girls, Inc. After School Program	Open to Ages (5-18)	Referrals	Resident Initiatives Department Al Chappelle Community Center	Public Housing Residents Housing Choice Voucher Residents
<b>Youth Services</b> Lewis Place Historical Preservation After School Program	Open to Ages (5-12)	Referrals	Resident Initiatives Department	Public Housing and Housing Choice Voucher Residents
<b>Youth Services</b> People's Community Action Corporation Wyman Center Teen Outreach (Middle School and High School) Program	Open to Ages (12-18) (5-11)	Referrals	Resident Initiatives Department Al Chappelle Community Center Youth & Family Center	Public Housing and Housing Choice Voucher Residents
<b>Youth Services</b> St. Louis Department of Parks, Recreation and Forestry	Open to Ages (6-13)	Referrals	Resident Initiatives Department McMillan Manor Residents	Public Housing Residents
<b>Youth Services</b> St. Louis City Health Department Youth at Risk Food Nutrition Program	Open to Ages (12-18) (5-11)	Referrals	Resident Initiatives Department Al Chappelle Community Center Youth & Family Center	Public Housing and Housing Choice Voucher Residents

<b>Youth Services</b> Urban League Head Start Early Childhood Education	Open to Ages (6 weeks-5 years)	Referrals	Multiple Head Start Locations	Public Housing and Housing Choice Voucher Residents
<b>Youth Services</b> Vision for Children at Risk	Open to Ages (0-8)	Referrals	Resident Initiatives Department	Public Housing and Housing Choice Voucher Residents
<b>Youth Services</b> Youth and Family Center	Open to Ages (5-18)	Referrals	Resident Initiatives Department Youth & Family Center	Public Housing and Housing Choice Voucher Residents
<b>Youth Services</b> Deaconess Center for Child Well-Being Advocacy Programs focused on Youth	Open to All	Referrals Walk-Ins Recruitment	Resident Initiatives Department	Public Housing and Housing Choice Voucher Residents
<b>Youth Services</b> Arts and Education Foundation Arts Education	Open to All	Recruitment	Resident Initiatives Department	Public Housing and Housing Choice Voucher Residents
<b>Youth Services</b> Pianos for People Arts Education	Open to All	Recruitment	Resident Initiatives Department	Public Housing and Housing Choice Voucher Residents
<b>Youth Services</b> Gateway Region YMCA Youth Programing	Open to Ages (5-14)	Referrals	Resident Initiatives Department Program	Public Housing Residents

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**St. Louis Housing Authority**  
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**ATTACHMENT #9**

**Section B.1 (a) – PHA Plan Update – Plan Elements Revised**

**Item 11 – Asset Management**  
**Long-term Capital Needs and Strategies**

The St. Louis Housing Authority (SLHA) has developed a long-term strategy for operating and maintaining Public Housing assets, which includes the use of third-party management companies and the completion of assessments to prioritize development and modernization activities.

Under the direction of the Director of Operations, the Asset Management Department is responsible for the oversight and administration of privatized management contracts that are responsible for the occupancy, maintenance, and upkeep of the SLHA portfolio. Retained management companies are required to timely report on operations based on key performance indicators. Financial and management indicators are routinely analyzed to assess performance and improve efficiency and operational costs.

In 2021, SLHA retained Bureau Veritas to complete a Physical Needs Assessment (PNA) and Energy Audit (EA) of its entire affordable housing portfolio. The purpose was two-fold: (1) to fully capture the conditions and needs of public housing units and buildings and (2) to serve as a tool when developing a portfolio plan and identifying strategic decisions regarding investments, including the use of Capital Funds, Rental Assistance Demonstration Program, among others. The PNA and EA were both completed in February 2022 and are currently being used to realign the capital fund plan to address needs identified in a targeted manner over the next five years.

The Development and Modernization Department, which administers the Capital Fund Program, utilizes the PNA and EA to accomplish portfolio-wide capital improvement planning, including physical and management improvements. The Department is responsible for tracking progress and updating priorities to adjust for fluctuating program funding. Throughout the portfolio, modernization activities will continue to be undertaken to extend the useful life of building systems of all scales and sizes, including vertical transportation (elevators); mechanical, electrical and plumbing system upgrades; targeted building exterior repairs and a comprehensive program of parking lot maintenance, site repairs, improvements and public safety.

SLHA will continue to pursue additional local, state and federal resources to assist with capital needs. In addition to the aforementioned capital fund planning, SLHA will also utilize the PNA and EA to create and implement a portfolio plan and repositioning strategy. HUD has provided a consultant to provide technical assistance to the agency with the goal of creating this strategy.

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**ATTACHMENT #10**

**Section B.1 (c) – Deconcentration of Poverty and Income Mixing [24 CFR 903.1 and 903.2]**

Deconcentration of poverty and income mixing is a policy that allows PHA's to bring higher income tenants into lower income developments and lower income tenants into higher income developments. In accordance with 24 CFR Part 903, a Deconcentration and Income Mixing Policy is required as a part of SLHA's Admissions and Continued Occupancy Policy (ACOP). SLHA's Deconcentration and Income Mixing Policy is included in Chapter 6 of the ACOP – Tenant Selection, Section 6.4.

Developments subject to the deconcentration of poverty and income mixing requirements are referred to as "covered" developments". Covered developments include general occupancy (or family) public housing developments.

Developments not subject to the requirement include public housing developments:

- with fewer than 100 public housing units;
- designated specifically for elderly and/or disabled residents;
- approved for demolition or for conversion to tenant-based assistance; and
- approved mixed-finance developments using HOPE VI or public housing funds.

**Table 2 - Average Income of Public Housing Developments** includes a list of all SLHA developments, their annual income and if they are subject to the Deconcentration and Income Mixing Requirements.

SLHA will determine the average income of families in all covered developments on an annual basis. SLHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85 percent to 115 percent of the average family income. The results of SLHA's analysis are summarized on **Table 1 - Average Income of Families in All Covered Developments**.

If covered developments have an average income outside the EIR, SLHA will then determine whether or not these developments are consistent with its local goals and annual plan. If the development is not consistent with local goals and annual plan the SLHA may skip a family on the waiting list to reach another family in an effort that would further the goals of deconcentration.

For FY 2022, SLHA revised its methodology used to complete the income analysis. In prior year's the average annual income was adjusted for bedroom sizes for each development. While permitted by HUD, this adjustment was not included in SLHA's policy in the ACOP. Going forward, the average annual income number will be used to streamline the analysis and present a more effective analysis.

**Deconcentration of Poverty and Income Mixing**  
**Table 1: Average Income of Families in Covered Developments**

Development Name	Average Income	Average Income ALL Developments	% of Income	Established Income Range (85% - 115%)
Clinton Peabody	\$6,901	\$11,525	60%	Below
James House	\$8,040	\$11,525	70%	Below
Euclid Plaza	\$8,190	\$11,525	71%	Below
Northside Scattered Sites	\$12,183	\$11,525	106%	Within
Parkview	\$9,403	\$11,525	82%	Below
Southside Scattered Sites	\$9,877	\$11,525	86%	Within
Badenhaus/Badenfest	\$8,596	\$11,525	75%	Below
LaSalle Park	\$13,908	\$11,525	121%	Within
Kingsbury Terrace	\$11,349	\$11,525	98%	Within
<b>ALL Covered Developments</b>	<b>\$9,941</b>	<b>\$11,525</b>	<b>86%</b>	-
<b>ALL DEVELOPMENTS</b>	<b>\$11,525</b>	<b>\$11,525</b>	<b>100%</b>	-

\*As of February 28, 2022

**Deconcentration of Poverty and Income Mixing**  
**Table 2: Average Income of Public Housing Developments\***

Dev. Number	Development Name		Count of Families	Average Income
020	Clinton-Peabody	Covered	222	\$6,901
100	James House	Covered	119	\$8,040
132	Euclid Plaza	Covered	105	\$8,190
150	Towne XV (NSSS)	Covered	7	\$16,997
160	McMillan Manor (NSSS)	Covered	10	\$7,469
170	West Pine	< 100 Units	94	\$10,170
190	Parkview	Covered	268	\$9,403
220	Lafayette Apartments (SSSS)	Covered	22	\$9,962
230	California Gardens (SSSS)	Covered	23	\$8,038
260	Page Manor (NSSS)	Covered	9	\$7,653
280	Badenhaus Elderly (BH/BF)	Covered	96	\$8,066
340	LaSalle Park	Covered	134	\$13,908
350	Armand & Ohio (SSSS)	Covered	4	\$14,804
370	Cochran Plaza	<100 Units	66	\$11,423
380	Folsom (SSSS)	Covered	3	\$3,176
381	Samuel Shepard (NSSS)	Covered	8	\$9,569
382	Marie Fanger (SSSS)	Covered	5	\$17,600
383	Cupples (NSSS)	Covered	3	\$15,782
384	Hodiamont (NSSS)	Covered	10	\$7,003
390	Badenfest Elderly (BH/BF)	Covered	20	\$11,137
410	South Broadway (SSSS)	Covered	10	\$15,235
411	Walnut Park (NSSS)	Covered	9	\$21,682
412	Lookaway (NSSS)	Covered	16	\$12,020
420	Lafayette Townhomes (SSSS)	Covered	26	\$8,625
421	Tiffany Turnkey (SSSS)	Covered	25	\$9,123
440	Murphy Park I	Mixed Finance/HOPE VI	75	\$13,804
450	Murphy Park II	Mixed Finance/HOPE VI	54	\$17,499
460	Murphy Park III	Mixed Finance/HOPE VI	61	\$13,321
470	King Louis Square I	Mixed Finance/HOPE VI	33	\$15,462
480	Les Chateau	Mixed Finance/HOPE VI	35	\$14,314
490	King Louis Square II	Mixed Finance/HOPE VI	38	\$14,219
500	Renaissance Place @ Grand I	Mixed Finance/HOPE VI	57	\$22,209
510	McMillan Manor II (NSSS)	Covered	14	\$14,555
520	King Louis Square III	Mixed Finance/HOPE VI	22	\$15,846
540	Sr. Living @ Renaissance Place	Mixed Finance/HOPE VI	75	\$13,078
550	Gardens at Renaissance Place	Mixed Finance/HOPE VI	22	\$10,521
560	Cahill House	Mixed Finance/HOPE VI	81	\$13,006
570	Renaissance Place @ Grand II	Mixed Finance/HOPE VI	30	\$13,287
580	Cambridge Heights	Mixed Finance/HOPE VI	33	\$15,828
590	Renaissance Place @ Grand III	Mixed Finance/HOPE VI	51	\$16,583
600	Cambridge Heights II	Mixed Finance/HOPE VI	33	\$16,715
620	Sr. Living @ Cambridge Heights	Mixed Finance/HOPE VI	72	\$12,782
630	Arlington Grove	Mixed Finance/HOPE VI	64	\$12,304
640	North Sarah	Mixed Finance/HOPE VI	58	\$10,955
650	North Sarah II	Mixed Finance/HOPE VI	41	\$12,238
660	North Sarah III	Mixed Finance/HOPE VI	33	\$13,342
661	Kingsbury Terrace	Covered	117	\$11,349
<b>Grand Total</b>			<b>2413</b>	<b>\$11,525</b>
<b>All Covered Developments</b>			<b>1071</b>	<b>\$9,941</b>

Combined Developments				
NSSS	Northside Scattered Sites	Covered	86	\$12,183
SSSS	Southside Scattered Sites	Covered	118	\$9,877
BH/BF	Badenhaus/Badenfest	Covered	116	\$8,596

\*As of February 28, 2022

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**Section B.2**

HOPE VI, Mixed-Finance Modernization or Development, Demolitions and/or Disposition, Conversion of Public Housing, Homeownership programs and Project-Based Vouchers

Item Number	Program Description	Project Description	Development Number	Unit Count /Affected Units	Time Table for Submission
B.2 (a)	Mixed-Finance	Family Replacement VI Replacement Housing Factor (RHF) FY 2014-2019 RHF funds are allocated for Phase I of Preservation Square, a Neighborhood Choice grant awarded to the City of St. Louis.	MO001000067	19 units Public Housing Phase I: 19 Units	Development Proposal submitted on 7/11/19. Timeline for activity: Start date of activity: 6/30/2020. Projected end date of construction: 04/30/2022. Activity end date 12/31/2022.
B.2 (a)	Mixed-Finance	Family Replacement VI Replacement Housing Factor FY 2015-2020 SLHA will use RHF funds to acquire or create new public housing units.	MO001000068	TO BE DETERMINED	Timeline for activity: Projected start date of activity: 2/28/2022. Projected end date of activity: 04/29/2023
B.2 (a)	Mixed-Finance	Clinton Peabody Revitalization The Physical Needs Assessment (PNA) finalized in 2022 shows a significant need for redevelopment of the Clinton-Peabody Apartments development. It will be revitalized by either modernization or redevelopment.	MO001000002	358 units Public Housing	Master Developer Proposal (RFQ) is due 4/19/22. Timeline for activity: Actual start date of activity: 07/31/2022. Projected end date of activity: TBD
B.2 (b)	Demolition/Disposition	Clinton-Peabody Revitalization The Physical Needs Assessment (PNA) finalized in 2022 shows a significant need for redevelopment of the Clinton-Peabody Apartments development. The property will be revitalized by either redevelopment, which may involve demolition activities, or modernization.	MO001000002	358 units Public Housing	Timeline for activity: Projected start date of activity:07/31/2022 Projected end date of activity TBD



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**HOPE VI, Mixed-Finance Modernization or Development, Demolitions and/or Disposition, Conversion of Public Housing, Homeownership programs and Project-Based Vouchers**

Item Number	Program Description	Project Description	Development Number	Unit Count /Affected Units	Time Table for Submission
B.2 (b)	Demolition/Disposition	<p>Hodiamont Disposition</p> <p>The PNA finalized in 2022 shows that the property would need \$4.6 million in renovation over 10 years to bring it up to standard. SLHA will submit to HUD a Section 18 application to demolish and/or dispose. The property will be demolished and/or sold.</p>	MO001000041	22 units Public Housing	<p>Timeline for activity: Technical assistance start date: 02/28/2022. Projected end date of activity 09/30/2023.</p>
B.2 (b)	Disposition	<p>Vaughn Family - Warehouse Facility</p> <p>SLHA will submit a Section 18 application to HUD requesting disposition of the property to help realign the SLHA portfolio to support/or create housing opportunities.</p>	MO001000006	0	<p>Timeline for activity: Projected start date of activity: 10/1/2022. Projected end date of activity 09/30/2023.</p>
B.2 (b)	Disposition	<p>Euclid Plaza Vacant Land</p> <p>SLHA will consider submitting a Section 18 application to HUD requesting disposition of the property to help realign the SLHA portfolio to create additional housing opportunities.</p>	MO001000013	0	<p>Timeline for activity: Projected start date of activity: 10/1/2022 Projected end date of activity 09/30/2023.</p>
B.2 (b)	Partial Disposition	<p>Lookaway Disposition</p> <p>The PNA finalized in 2022 show that these properties would need \$3.1 million in capital improvements over 10 years. SLHA will consider submitting to HUD an application requesting the conversion of single-family PH units to affordable home ownership opportunities.</p>	MO001000041	17	<p>Timeline for activity: Projected start date of activity: 10/01/2022 Projected end date of activity 09/30/2023</p>

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**HOPE VI, Mixed-Finance Modernization or Development, Demolitions and/or Disposition, Conversion of Public Housing, Homeownership programs and Project-Based Vouchers**

<b>Item Number</b>	<b>Program Description</b>	<b>Project Description</b>	<b>Development Number</b>	<b>Unit Count /Affected Units</b>	<b>Time Table for Submission</b>	
B.2 (c)	Designated Housing for Elderly and/or Disabled Families	Parkview Apartments - Convert from family to designated elderly housing.	MO001000019	295	Timeline for activity: Projected start date of activity: 10/1/2022 Projected end date of activity 03/31/2023.	
B.2 (d)	Conversion of Public Housing to tenant-based or to project-based under RAD conversion.	SLHA plans to submit applications under this type of conversion in FY 2022, as a result of the PNA completed in 2021 and HUD consultant assistance to determine which developments will meet eligibility for RAD Conversion.	TO BE DETERMINED	TO BE DETERMINED	Timeline for activity: Projected start date of activity: TBD. Projected end date of activity TBD.	
B.2 (e)	Homeownership	Near South Side LA Saison Construction of 10 single-family homes in two Phases. Conversion of 10 lots to homeownership opportunities.		10	Vacant Lots: Actual start date of activity: 5/31/2016. Phase I - 5 homes constructed. Four of the 5 homes sold in 2022, the final home to be sold in 2023. Phase II - 5 units to start by June 2022. The projected end date for activity: 12/31/2024.	
B.2 (e)	Homeownership	Section 8 - Currently		30		
B.2 (f)	Mainstream Voucher program	SLHA receives vouchers from HUD to assist near elderly and/or disabled families.			<b>Allocated</b> 37	<b>Leased</b> 31
B.2 (f)	Special Purpose: Section 8 Assistance Program (VASH) voucher	SLHA continues to receive referrals from the Veteran's Administration for a Special-purpose voucher program under the Veterans Affairs Supportive Housing (VASH) program.			<b>Allocated</b> 253	<b>Leased</b> 217
B.2 (f)	Special Purpose: Tenant Protection Voucher (TPV) program	SLHA receives Tenant Protection Vouchers (TPV) from HUD for special purposes				<b>Leased</b> 156
B.2 (f)	Special Purpose: Emergency Housing	SLHA receives vouchers from HUD in order to assist individuals and families			<b>Allocated</b> 161	<b>Leased</b> 77

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**HOPE VI, Mixed-Finance Modernization or Development, Demolitions and/or Disposition, Conversion of Public Housing, Homeownership programs and Project-Based Vouchers**

Item Number	Program Description	Project Description	Development Number	Unit Count /Affected Units	Time Table for Submission
	Voucher	that are homeless or at risk of being homeless, fleeing, or attempting to flee, domestic violence.			
B.2 (f)	Project-based Vouchers	SLHA has 606 Project-based units. SLHA may consider soliciting for a developer through the RFP process to provide project based voucher rental assistance.	Approved:	23rd Street Elderly, L.P. 25th Street Elderly, L.P. Blumeyer Elderly, L.P. Blumeyer II Associates Cambridge Seniors, L.P. Carr Square Tenant Corp. FP-San Remo Develop., L.P. Grand South Senior, L.P. Hammond Apartments, L.P. Homer G. Phillips, Hist JVL Renaissance I, L.P. JVL Renaissance II, L.P. K-M Housing, LLC Railton Residence, L.P. Salvation Army STL Garrison Residence, L.P. (VA) Salvation Army STL Garrison Residence, L.P. Vaughn Elderly, L.P. Water Tower Place, L.P.	74 65 30 8 36 76 14 80 28 48 6 7 4 50 18 6 26 30 <hr/> <b>Total:</b> <hr/> 606

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**HOPE VI, Mixed-Finance Modernization or Development, Demolitions and/or Disposition, Conversion of Public Housing, Homeownership programs and Project-Based Vouchers**

<b>Item Number</b>	<b>Program Description</b>	<b>Project Description</b>	<b>Development Number</b>	<b>Unit Count /Affected Units</b>	<b>Time Table for Submission</b>
B.2 (g)	Emergency Safety and Security Application	SLHA continues to apply for funds to address crime and drug-related activities that pose an increased threat to health and safety of residents. The Capital Fund budget for FY 2022 has a line item for PHA Wide security upgrades and improvements. SLHA will submit a health and safety grant for safety improvements at Parkview Apartments.	MO001000099	PHA Wide	Emergency safety and security application submission anticipated 06/15/22. Timeline for activity: Actual start date of activity: 10/01/2022. Projected end date of activity: 09/30/2023.

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**ATTACHMENT # 12**

**Section B.2 (b) – New Activities**

**Item 11 – Units with Approved Vacancies for Modernization**

Clinton-Peabody, AMP MO001000002, will undergo comprehensive modernization of 27 units for water / mold damage repairs (20 units) and the fire damage repairs (7 units). The St. Louis Housing Authority (SLHA) has obtained HUD approval for 27 units to be placed into modernization status in IMS/PIC system.

Hodiamont, AMP MO001000041, will undergo an asset repositioning strategy for the property. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 10 units to be placed into modernization status in IMS/PIC system.

King Louis II, AMP MO001000049, The St. Louis Housing Authority (SLHA) has obtained HUD approval for 2 units to be placed into modernization status in IMS/PIC system.

King Louis III, AMP MO001000052, will undergo comprehensive modernization of 2 units for water damage repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 2 units to be placed into modernization status in IMS/PIC system.

Lafayette Townhomes, AMP MO001000038, will undergo comprehensive modernization of 4 units for structural repairs and associated unit interior repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 4 units to be placed into modernization status in IMS/PIC system.

LaSalle Park, AMP MO001000034, will undergo comprehensive modernization of 2 units for repairs related to fire damage (1) and sewer (1). The St. Louis Housing Authority (SLHA) has obtained HUD approval for 2 units to be placed into modernization status in IMS/PIC system.

Marie Fanger, AMP MO001000038, will undergo comprehensive modernization of 1 unit for repairs related to mold and water damage. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 1 unit to be placed into modernization status in IMS/PIC system.

Parkview Apartments, AMP MO001000019, will undergo modernization of 10 units for water infiltration damage repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 10 units to be placed into modernization status in IMS/PIC system.

Renaissance Place @ Grand II, AMP MO001000050, will undergo reconstruction of 3 units for catastrophic fire damage. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 3 units to be placed into modernization status in IMS/PIC system.

Samuel Shepard, AMP MO001000041, will undergo comprehensive modernization of 3 units for fire damage (1) and water / mold damage (2) repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 3 units to be placed into modernization status in IMS/PIC system.

Walnut Park, AMP MO001000041, will undergo comprehensive modernization of 4 units for water / mold damage repairs (1 unit) and vandalism (3 units). The St. Louis Housing Authority (SLHA) has obtained HUD approval for 4 units to be placed into modernization status in IMS/PIC system.

Cupples, AMP MO001000041 will undergo comprehensive modernization of 1 unit. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 1 unit to be placed into modernization status in IMS/PIC system. Cambridge Phase I, AMP MO001000058, will undergo comprehensive modernization of 3 units for age and major repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 3 units to be placed into modernization status in IMS/PIC system.

McMillan Manor 1 & II, AMP MO001000041, will undergo comprehensive modernization of 10 units for necessary age-related major repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 10 units to be placed into modernization status in IMS/PIC system.

**Civil Rights Certification**  
**(Qualified PHAs)**

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB Approval No. 2577-0226  
Expires 3/31/2024

**Civil Rights Certification**

**Annual Certification and Board Resolution**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning 2022 in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the mission, goals, and objectives of the public housing agency and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further fair housing that require the PHA’s involvement; and maintains records reflecting these analyses and actions.

The St. Louis Housing Authority  
PHA Name

MO001  
PHA Number/HA Code

I hereby certify that all the statement above, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Executive Director:		Name of Board Chairperson:	
Alana C. Green		Sal Martinez	
Signature	Date <u>7/15/2022</u>	Signature	Date <u>7/15/2022</u>

The United States Department of Housing and Urban Development is authorized to collect the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. The information is collected to ensure that PHAs carry out applicable civil rights requirements.

Public reporting burden for this information collection is estimated to average 0.16 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

**St. Louis Housing Authority**  
**FY 2022 Annual Plan**

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**ATTACHMENT #14**

**Section B.5 – Progress Report**

**Status of Goals and Objectives**

The St. Louis Housing Authority (SLHA) revised its Five-Year Strategic Plan in 2020. In 2018, the leadership of the SLHA determined that the strategic plan developed in 2013 was out of date and needed to be revised. To accomplish the task, in 2019, SLHA retained the Bronner Group to facilitate the creation of the Strategic Plan (Plan). Development of the Plan included two public meetings, two staff/board retreats, interviews with staff and stakeholders and over 700 survey responses. The new Plan was approved by the Board of Commissioners by resolution #2903 at its February 2020 meeting.

The Plan establishes the strategic focus that will drive the SLHA to deliver quality housing and services to our community. SLHA designed the Five-Year Strategic Plan to coincide with the City of St. Louis' 2020-2025 Consolidated Plan. This will allow for greater collaboration, communication and streamlining of housing strategies for the St. Louis region.

Thereafter, SLHA implemented a tracking system (Goal Tracker) to establish the milestones for the goals and objectives of the Plan. By this time, SLHA's focus on priorities drastically changed due to the Covid-19 Pandemic. SLHA engaged in activities to respond to the pandemic by implementing measures to protect residents, clients and staff. SLHA staff has been engaged in numerous activities to change policies, increase awareness, purchase personal protective equipment, supplies and services for all developments and offices. In addition, SLHA has hired contractors to install new safety measures for adopting social distancing and protection against infection or transmission.

Due to the pandemic, SLHA had delayed the implementation of its Strategic Plan goals and objectives until operations start to stabilize. The Plan has been revised with new milestones and progress of activities.



ID	Level	Goal/Objective/Action	Responsible Unit/ Person	Target Start Date	Target End Date	Percent Complete	Status
<b>1</b>	<b>Goal</b>	<b>Support safe and secure environments for SLHA's residents and staff</b>				<b>8%</b>	<b>Underway</b>
<b>1.1</b>	<b>STR</b>	<b>Develop Standardized Safety Plan for all properties and sites</b>	<b>Asset Management</b>	<b>October 1, 2021</b>	<b>December 31, 2024</b>	<b>0%</b>	<b>Not Started</b>
1.1.1	ACT	Assess current safety practices and informal safety plans at developments	Asset Management	October 1, 2021	June 30, 2022	0%	Not Started
1.1.2	ACT	Review existing policies regarding access to SLHA properties and update as needed; develop a formal plan if unavailable	Asset Management	October 1, 2021	June 30, 2022	0%	Not Started
1.1.3	ACT	With assistance of the property management companies, draft and implement a standardized safety plan using a Trauma Informed lens	Asset Management	October 1, 2021	June 30, 2022	0%	Not Started
1.1.4	1.1.5	Create and utilize a checklist to use to monitor property management companies to ensure adherence to safety plans and the maintenance of a safe and secure property	Asset Management	October 1, 2021	June 30, 2022	0%	Not Started
1.1.5	ACT	With assistance of property management companies, create emergency management plans for each development, creating signage of evacuation plans if unavailable	Asset Management	October 1, 2021	June 30, 2022	0%	Not Started
1.1.6	ACT	Conduct preparedness exercises at all public housing developments (Active shooter, fire, earthquake, tornado, etc)	Asset Management	October 1, 2021	December 31, 2024	0%	Not started
<b>1.2</b>	<b>STR</b>	<b>Work collaboratively with residents, neighbors and the Police Department to foster safe and secure environments</b>	<b>Asset Management</b>	<b>May 1, 2021</b>	<b>December 31, 2024</b>	<b>13%</b>	<b>Underway</b>
1.2.1	ACT	On a quarterly basis, request police department to attend resident meetings	Asset Management	July 1, 2021	December 31, 2024	20%	On-going
1.2.2	ACT	Annually, request that the Fire Department attend resident meetings to address fire safety	Asset Management	July 1, 2021	December 31, 2024	0%	Not started
1.2.3	ACT	With the assistance of the SLMPD, implement a strategy for community policing in public housing	Executive	May 1, 2021	December 31, 2021	20%	Underway
1.2.4	ACT	Annually, attend neighborhood meetings in neighborhoods with 50+ public housing units to foster relationships	Asset Management	July 1, 2021	December 31, 2024	10%	Underway
<b>1.3</b>	<b>STR</b>	<b>Identify and address environmental hazards to promote healthy homes</b>	<b>Asset Management, HCV</b>	<b>January 1, 2020</b>	<b>December 31, 2024</b>	<b>10%</b>	<b>Underway</b>
1.3.1	ACT	Monitor property management companies to ensure that annual inspections occur in a timely manner and that issues identified are addressed	Asset Management	January 1, 2021	December 31, 2024	60%	On-going
1.3.2	ACT	Request copies of Pre-REAC inspections completed by property management companies and monitor for health and safety deficiencies; follow up as needed	Asset Management	January 1, 2021	December 31, 2024	70%	On-going
1.3.3	ACT	Create checklist to use and spot check public housing inspections to ensure timely and proper completion	Asset Management	January 1, 2021	December 31, 2024	30%	Underway
1.3.4	ACT	Complete HCV Inspections, including quality control inspections, in a timely manner; require landlords to complete necessary repairs in a timely manner.	HCV	January 1, 2020	December 31, 2024	30%	Underway
<b>1.4</b>	<b>STR</b>	<b>Create a safety plan for SLHA central office</b>	<b>Executive</b>	<b>April 1, 2021</b>	<b>December 31, 2024</b>	<b>10%</b>	<b>Underway</b>
1.4.1	ACT	Assess current safety practices and informal safety plans	Executive	April 1, 2021	August 31, 2022	10%	Underway
1.4.2	ACT	Review existing policies regarding access to SLHA central office and update as needed; develop a formal safety plan if unavailable	Executive	April 1, 2021		10%	Underway
1.4.3	ACT	Create emergency management plan, creating signage of evacuation plans if unavailable	Development & Modernization	August 30, 2021	June 30, 2022	80%	Underway
1.4.4	ACT	Conduct preparedness exercises (active shooter, fire, earthquake, tornado, etc)	Development & Modernization	June 30, 2022	December 31, 2024	0%	Not started
<b>2</b>	<b>Goal</b>	<b>Support safe and secure environments for SLHA's residents and staff</b>				<b>16%</b>	<b>Underway</b>
<b>2.1</b>	<b>STR</b>	<b>Update Capital and Property Portfolio Plans</b>	<b>Executive, Development &amp; Modernization</b>	<b>September 20, 2020</b>	<b>February 22, 2022</b>	<b>44%</b>	<b>Not started</b>
2.1.1	ACT	Perform Physical Needs Assessment of properties	Development & Modernization	April 1, 2021	March 31, 2022	100%	Complete
2.1.2	ACT	Perform Asset repositioning exercise to create portfolio plan; considering Demo/disposition, RAD, Section 8 conversion, etc.	Executive, Development & Modernization	October 1, 2021	October 31, 2022	20%	Underway
2.1.3	ACT	Perform Environmental Review	Development & Modernization	September 1, 2020	June 30, 2022	90%	Underway
2.1.4	ACT	Explore non-traditional financing tools (bonds, tax credits, opportunity zones, refinancing, etc.) for top priority properties within Portfolio Plan	Development & Modernization	November 1, 2021	December 31, 2022	0%	Not started
2.1.5	ACT	Identify and leverage underutilized assets to generate revenue	Executive, Development & Modernization	December 1, 2021	October 31, 2022	10%	Underway
<b>2.2</b>	<b>STR</b>	<b>Communicate benefits and program changes of new housing programs (i.e. RAD) to internal and external stakeholders</b>	<b>Development &amp; Modernization</b>	<b>January 13, 2022</b>	<b>April 11, 2023</b>	<b>0%</b>	<b>Not started</b>
2.2.1	ACT	Develop talking points, PR/campaign materials for the new programs being adopted across portfolio (internal and external stakeholders)	Development & Modernization	January 13, 2022	October 31, 2022	0%	Not started
2.2.2	ACT	Schedule meetings with different stakeholder groups (staff, TAB, general public mtgs, etc.)	Development & Modernization	March 25, 2022	October 31, 2022	0%	Not started



2.2.3	ACT	Develop online content (website, social media) to communicate new program info, FAQs, etc.	Development & Modernization	January 13, 2022	October 31, 2022	0%	Not started
2.3	STR	<b>Implement Portfolio Plan</b>	<b>Executive, Development &amp; Modernization</b>	<b>April 5, 2022</b>	<b>July 22, 2023</b>	<b>10%</b>	<b>Underway</b>
2.3.1	ACT	Identify and secure financing to complete redevelopment of Clinton-Peabody (see Goal 4)	Executive, Development & Modernization	April 5, 2022	December 31, 2022	0%	Not started
2.3.2	ACT	Develop procurement solicitation (RFP/RFQ) for development assistance	Development & Modernization	May 5, 2022	July 5, 2024	30%	Underway
2.3.3	ACT	Implement development plan in accordance with scope of work outlined in the RFP/RFQ/contract	Development & Modernization	July 5, 2022	July 22, 2024	0%	Not started
2.4	STR	<b>Pursue development opportunities (new)</b>	<b>Executive, Development &amp; Modernization</b>	<b>April 1, 2021</b>	<b>July 29, 2022</b>	<b>10%</b>	<b>Underway</b>
2.4.1	ACT	Ensure spending of replacement housing funds by regulatory deadline (some funds may be used for Clinton-Peabody - refer to Goal 4)	Development & Modernization	April 1, 2021	April 29, 2023	10%	Underway
2.4.2	ACT	Identify sites for potential new development	Executive, Development & Modernization	May 1, 2021	December 31, 2024	10%	Underway
2.4.3	ACT	Develop procurement solicitation (RFP/RFQ) for development assistance	Development & Modernization	June 1, 2021	December 31, 2024	10%	Underway
2.4.4	ACT	Implement development plan in accordance with scope of work outlined in the RFP/RFQ/contract	Development & Modernization	July 12, 2021	December 31, 2024	10%	Underway
3	Goal	<b>Strengthen monitoring and oversight of Property Management companies</b>					<b>Underway</b>
3.1	STR	<b>Strengthen contract compliance monitoring and enforcement and revise contract language</b>	<b>Asset Management</b>	<b>January 1, 2021</b>	<b>December 31, 2024</b>	<b>50%</b>	<b>Underway</b>
3.1.1	ACT	Strengthen contract compliance monitoring and enforcement and revise contract language	Asset Management	January 1, 2021	December 1, 2021	100%	On-going
3.1.2	ACT	Monitor the performance metrics and baseline measures by inspecting the properties at least annually, reviewing monthly reports submitted by property managers, and meeting with the property management companies monthly.	Asset Management	February 1, 2021	December 31, 2024	80%	Underway
3.1.3	3.1.4	Enforce compliance with contract requirements, requiring corrective action plans as needed.	Asset Management	January 1, 2021	December 31, 2024	100%	On-going
3.2	STR	<b>Create and enforce standards of professionalism and customer service across all properties</b>	<b>Asset Management</b>	<b>October 1, 2021</b>	<b>December 31, 2024</b>	<b>5%</b>	<b>Underway</b>
3.2.1	ACT	Convene two meetings with property management companies to mutually agree on a standard code of conduct and dress code for employees at public housing developments.	Asset Management	October 1, 2021	December 31, 2022	10%	Underway
3.2.2	ACT	Utilizing information from meetings, develop standard code of conduct and dress code for property management staff.	Asset Management	October 1, 2021	December 21, 2022	0%	Not started
3.2.3	ACT	Annually, conduct customer service/professionalism training for property management companies.	Asset Management	October 1, 2021	December 31, 2024	10%	Underway
3.2.4	ACT	Monitor property management companies for adherence to the code of conduct and dress code.	Asset Management	October 21, 2021	December 31, 2024	0%	Not started
4	Goal	<b>Plan and implement redevelopment of Clinton-Peabody</b>				<b>16%</b>	<b>Underway</b>
4.1	STR	<b>Continue to implement actions agreed upon in Consent Agreement</b>	<b>Legal</b>	<b>January 1, 2020</b>	<b>July 22, 2022</b>	<b>50%</b>	<b>Underway</b>
4.1.1	ACT	Refer to consent agreement and implement	Legal	January 1, 2020	July 22, 2022	50%	Underway
4.2	STR	<b>Identify Master Developer to identify financing to complete redevelopment of Clinton-Peabody</b>	<b>Executive, Development &amp; Modernization</b>	<b>April 5, 2022</b>	<b>December 31, 2022</b>	<b>20%</b>	<b>Underway</b>
4.2.1	ACT	Solicit for Master Developer to determine type of project and financing	Development & Modernization	April 5, 2022	December 31, 2022	40%	Underway
4.2.2	ACT	Analysis and determination of viable project and financing	Development & Modernization	June 5, 2022	December 31, 2022	0%	Not started
4.3	STR	<b>Provide clear communication in transparent manner to residents and the community</b>	<b>Development &amp; Modernization</b>	<b>June 5, 2022</b>	<b>February 11, 2023</b>	<b>0%</b>	<b>Not started</b>
4.3.1	ACT	Support existing residents during redevelopment and construction activities	Development & Modernization	June 5, 2022	December 31, 2025	0%	Not started
4.4	STR	<b>Develop and Implement plan to redevelop Clinton-Peabody</b>	<b>Development &amp; Modernization</b>	<b>February 23, 2022</b>	<b>December 31, 2026</b>	<b>3%</b>	<b>Underway</b>
4.4.1	4.4.2	See 4.3.1	Development & Modernization	February 23, 2022	December 31, 2025	0%	Not started
4.4.2	ACT	Hire 3rd party developer to implement development plan	Executive, Development & Modernization	February 28, 2022	July 31, 2022	40%	Underway



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4.4.3	ACT	Analysis of viable development and funding options from 4.2.1	Development & Modernization	July 31, 2022	September 1, 2022	0%	Not started
4.4.4	ACT	Create development plan and schedule	Development & Modernization	July 31, 2022	December 31, 2022	0%	Not started
4.4.5	ACT	Implement development plan and schedule	Development & Modernization	January 23, 2023	December 31, 2024	0%	Not started
4.4.6	ACT	Concept, Pre-Development	Development & Modernization	July 1, 2022	June 30, 2023	0%	Not started
4.4.7	ACT	Environmental Assessment, Review	Development & Modernization	July 31, 2022	December 31, 2022	0%	Not started
4.4.8	ACT	Initiate Public Engagement	Development & Modernization	July 31, 2022	December 31, 2024	0%	Not started
4.4.9	ACT	Tax Credit Applications, Abatement, Zoning, Utility	Development & Modernization	July 31, 2022	December 31, 2024	0%	Not started
4.4.10	ACT	HUD Development Proposal, Evidentiaries, Closing	Development & Modernization	July 31, 2022	December 31, 2024	0%	Not started
4.4.11	ACT	Construction-Site Prep, Housing & Public Improvements	Development & Modernization	July 31, 2022	December 31, 2024	0%	Not started
4.4.12	ACT	Construction	Development & Modernization	July 31, 2022	December 31, 2024	0%	Not started
4.4.13	ACT	Lease-Up and Development Close-Out	Development & Modernization	July 31, 2022	December 31, 2024	0%	Not started
4.5	STR	Ensure safe and secure environments for Clinton-Peabody residents and staff (see Goal 1)	Asset Management			8%	Underway
5	Goal	Expand housing opportunities within the Housing Choice Voucher program					Underway
5.1	STR	Improve relations with HCV participants and property owners	HCV	June 1, 2022	December 31, 2024	25%	Underway
5.1.1	ACT	Create and Implement Customer Service Plan for HCV participants	HCV	June 1, 2022	June 1, 2023	0%	Not Started
5.1.2	ACT	Update the resident and landlord information packets	HCV	June 1, 2022	June 1, 2023	0%	Not Started
5.1.3	ACT	Annually, issue landlord satisfaction survey to identify program strengths and weaknesses	HCV	June 1, 2022	December 31, 2024	0%	Not Started
5.1.4	ACT	Annually, issue resident satisfaction survey to identify program strengths and weaknesses	HCV	June 1, 2022	December 31, 2024	0%	Not Started
5.2	STR	Increase number of vouchers	HCV	January 1, 2020	December 31, 2024	40%	Underway
5.2.1	ACT	Monitor NOFAs for vouchers	HCV	January 1, 2020	December 31, 2024	60%	Underway
5.2.2	ACT	Apply for grants	HCV	January 1, 2020	December 31, 2024	60%	Underway
5.2.3	ACT	Implement if awarded	HCV	January 1, 2020	December 31, 2024	60%	Underway
5.3	STR	Provide mobility support to households that seek to live in areas of opportunity	HCV	October 1, 2019	September 30, 2024	60%	Underway
5.3.1	ACT	Introduce HCV participants to the Ascend Mobility Counseling program at recertification; enroll participants	HCV	January 1, 2020	January 1, 2024	60%	Underway
5.3.2	ACT	Provide pre/post move counseling	Ascend	October 1, 2019	September 30, 2024	60%	Complete
5.3.3	ACT	Property owner outreach	Ascend	October 1, 2019	September 30, 2024	60%	Complete
5.3.4	ACT	Continue to have competitive payment standards	HCV	January 1, 2020	January 1, 2024	60%	Complete
5.4	STR	Increase number of participating landlords with emphasis in areas of opportunity	Mobility Connection	October 1, 2022	September 30, 2023	0%	Not Started
5.4.1	ACT	Develop a marketing plan	Ascend	October 1, 2022	January 1, 2023	0%	Not Started
5.4.2	ACT	Approve marketing plan	Ascend	January 1, 2023	January 31, 2023	0%	Not Started
5.4.3	ACT	Implement marketing plan	Ascend	February 1, 2023	September 30, 2023	0%	Not Started
6	Goal	Expand and diversify funding and partnerships				30%	Underway
6.1	STR	Expand resources for resident services	Resident Initiatives	October 1, 2019	December 31, 2024	63%	Underway
6.1.1	ACT	Consider submitting application for Al Chapelle Center to achieve designation as Envision Center from HUD	Executive	September 1, 2022	December 31, 2024	0%	Not Started
6.1.2	ACT	Apply for volunteer resource from AmeriCorps and other Federal programs including Volunteer Students from local Universities.	Resident Initiatives	Summer 2021	Summer 2024	60%	Underway
6.1.3	ACT	Submit application for NOFA Mobility Program	Ascend	Spring/Summer 2020	Fall 2020	100%	Complete
6.1.4	ACT	Leverage ConnectHome USA program to expand internet access to residents through external partnerships	IT	October 1, 2019	September 30, 2022	90%	Underway
6.2	STR	Explore creating "grant writing" position	Executive	October 1, 2021	September 1, 2022	7%	Underway
6.2.1	ACT	Identify funding options for this position	Executive	March 1, 2022	September 1, 2022	0%	Not Started
6.2.2	ACT	Conduct benchmarking on how other PHAs seek grant funding	Executive	October 1, 2021	December 31, 2022	20%	Underway
6.2.3	ACT	Develop grant writing job description	HR	April 1, 2022	September 1, 2022	0%	Not Started
6.3	STR	Expand resources for housing opportunities	Executive	September 1, 2021	October 1, 2023	20%	Underway
6.3.1	ACT	Explore non-traditional financing tools (bonds, tax credits, opportunity zones, etc.) - see Goal 2	Executive	September 1, 2021	September 1, 2022	40%	Underway
6.3.2	ACT	Apply for non-traditional financing tools	Executive	October 1, 2022	October 1, 2023	0%	Not Started
6.4	STR	Attract resources from the philanthropic, local, civic and business community with specific requests	Executive	October 1, 2020	September 1, 2024	48%	Underway



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6.4.1	ACT	Direct funding raised via 80th Anniversary event to resident related activities	Executive	January 1, 2021	December 31, 2022	60%	Underway
6.4.2	ACT	Create ConnectHome partnerships with partner organizations	Executive, IT	January 9, 2020	December 31, 2021	90%	Underway
6.4.3	ACT	Leverage resources from Program Coordinating Committee within Resident Initiatives	Resident Initiatives	October 1, 2020	December 31, 2024	40%	Underway
6.4.4	ACT	Develop MOUs with partner agencies	Resident Initiatives	December 1, 2020	December 31, 2024	30%	Underway
6.4.5	ACT	Use calendar, key milestones, and funding requirements for the priority foundations in region	Executive	October 1, 2021	September 30, 2024	50%	Not Started
6.4.6	ACT	Identify grant/funding opportunities for youth services	Resident Initiatives	October 1, 2021	September 30, 2024	20%	Not Started
6.5	STR	Leverage instrumentalities to generate additional resources to support the authority's mission	Executive	January 1, 2020	September 30, 2024	10%	Underway
6.5.1	ACT	Create earned income/non-federal income through repurposing existing assets	Executive	September 1, 2021	September 30, 2024	10%	Underway
6.5.2	6.5.3	Analyze existing instrumentality/affiliate structure and determine optimal structure	Executive	January 1, 2020	December 31, 2024	10%	Underway
7	Goal	Optimize internal operations				25%	Underway
7.1	STR	Leverage technology for efficiencies and improved performance	IT	January 1, 2020	December 31, 2024	47%	Not Started
7.1.1	ACT	Complete implementation of Yardi Phase 1 (internal)	IT	January 1, 2020	June 30, 2022	90%	Underway
7.1.2	ACT	Launch RentCafe module and marketing programs for Owners, Participants and Residents	IT, HCV & PHA	January 1, 2020	December 31, 2022	50%	On-going
7.1.3	ACT	Explore purchase order workflows and implement if feasible	IT	April 1, 2021	December 31, 2021	0%	Not Started
7.1.4	ACT	Plan for implementation of additional Yardi modules that were purchased (e.g. Budget, Construction, online rent payments, etc.)	IT	July 1, 2021	December 31, 2021	0%	Not Started
7.1.5	ACT	Provide training to staff to better protect sensitive and confidential information from cyber risks	IT	January 1, 2020	December 31, 2024	50%	Underway
7.1.6	ACT	Further virtualize the IT server environment to eliminate the need for physical hardware.	IT	January 1, 2020	December 31, 2024	60%	On-going
7.1.7	ACT	Update and better utilize Microsoft 365 tools, such as SharePoint and Teams	Everyone	March 15, 2020	December 31, 2024	80%	On-going
7.2	STR	Optimize processes, procedures and controls	Executive	January 1, 2020	December 31, 2022	25%	Underway
7.2.1	ACT	Review existing procedures, manuals, policies, etc. to identify areas where updates are needed or gaps exist	Executive	January 1, 2020	December 31, 2022	80%	Underway
7.2.2	ACT	Update and create policies/procedures/etc. within team/department with agency-wide standards	Executive	January 1, 2021	December 31, 2023	10%	Underway
7.2.3	ACT	Create Business Continuity Plan to ensure critical processes continue in the event of a disruption.	Executive	March 15, 2020	December 31, 2021	50%	Underway
7.2.4	ACT	Update Personnel policy	HR	May 21, 2021	December 31, 2022	10%	Underway
7.2.5	ACT	Compile key procedures into an SLHA Standard Operating Procedure	Executive	December 31, 2021	December 31, 2023	0%	Not Started
7.2.6	ACT	Create a maintenance framework to ensure that all SLHA plans remain current and applicable	Executive	December 31, 2021	December 31, 2022	0%	Not Started
7.3	STR	Retain and attract talent	HR	March 1, 2022	December 31, 2022	0%	Not Started
7.3.1	ACT	Perform compensation and benefits study; request recommendations	HR	March 1, 2022	December 31, 2022	0%	Not Started
7.3.2	ACT	Update Succession Plan to identify next generation of SLHA leaders	HR	March 1, 2022	December 31, 2022	0%	Not Started
7.4	STR	Provide training and professional development opportunities to staff	HR	April 1, 2021	December 31, 2024	50%	Underway
7.4.1	ACT	Identify agency-wide training needs - required training AND "soft skills" (including training on processes); implement as needed	HR	June 1, 2021	December 31, 2024	40%	Underway
7.4.2	ACT	Create and implement framework for Personalized Development/Growth Plans for all SLHA staff	HR	April 1, 2021	August 31, 2022	50%	Underway
7.4.3	ACT	Conduct annual staff retreat or "in-service".	HR	April 1, 2021	December 31, 2024	60%	On-going
7.5	STR	Maintain HCV High Performer status	HCV	February 24, 2020	December 31, 2024	28%	Underway
7.5.1	ACT	Hold monthly SEMAP meetings to identify status and deficiencies	Internal Auditor, HCV	June 1, 2021	December 31, 2024	20%	Not Started
7.5.2	ACT	Conduct bi-annual compliance/file reviews of HCV files; report findings to Executive Director	Operations	June 1, 2021	December 31, 2024	20%	Not Started
7.5.3	ACT	Hold annual debriefing after SEMAP submission, identifying areas of improvement	Operations	October 15, 2020	December 31, 2024	20%	Underway
7.5.4	ACT	Streamline and simplify forms and documents used by HCV participants and owners	Operations	February 24, 2020	September 30, 2022	50%	Not Started
7.6	STR	Recapture PH High Performer status	Asset Management	January 1, 2020	December 31, 2024	0%	Underway
7.6.1	ACT	Hold monthly PHAS indicators meetings to identify status and deficiencies	Asset Management	January 1, 2020	December 31, 2024	100%	On-going
7.6.2	ACT	Conduct bi-annual Public Housing files; report findings to Executive Director	Operations	June 1, 2020	December 31, 2024	20%	On-going
7.6.3	ACT	Hold annual debriefing after PHAS submission, identifying areas of improvement	Operations	October 15, 2020	December 31, 2024	20%	On-going
7.6.4	ACT	Streamline and simplify forms and documents used by public housing residents and property management companies	Asset Management	December 1, 2021	September 30, 2022	20%	Underway
8	Goal	Promote and maintain positive community identity and relationships				32%	Underway



8.1	STR	Create PH Resident Engagement Plan	Resident Initiatives	August 1, 2020	December 31, 2024	28%	Underway
8.1.1	ACT	Research and identify best practices for resident engagement	Resident Initiatives	July 1, 2021	December 31, 2024	50%	Underway
8.1.2	8.1.3	Convene meeting of residents to obtain feedback (e.g. TAB, resident commissioners)	Resident Initiatives	December 1, 2021	August 31, 2022	60%	Underway
8.1.3	ACT	Create draft Engagement Plan	Marketing	August 31, 2022	September 30, 2022	0%	Not Started
8.1.4	ACT	Submit draft Plan for comment and update as appropriate (Board meeting packet)	Executive	November 1, 2022	November 30, 2022	0%	Not Started
8.2	STR	Create HCV Participant/Landlord Engagement Plan	Marketing & HCV	August 1, 2021	December 31, 2022	0%	Not Started
8.2.1	ACT	Research and identify best practices for HCV participant and Landlord engagement	Marketing & HCV	August 1, 2021	November 30, 2022	0%	Not Started
8.2.2	ACT	Convene meeting of HCV participants to obtain feedback	HCV	August 1, 2022	December 31, 2022	0%	Not Started
8.2.3	ACT	Convene meeting of Landlord to obtain feedback	HCV	August 1, 2022	December 31, 2022	0%	Not Started
8.2.4	ACT	Create draft Engagement Plan	Marketing	August 1, 2021	November 30, 2022	0%	Not Started
8.2.5	ACT	Submit draft Plan for comment and update as appropriate (Board meeting packet)	Executive	November 1, 2022	November 30, 2022	0%	Not Started
8.3	STR	Strengthen relationships with the community and civic organizations	Executive	March 1, 2020	December 31, 2024	60%	Underway
8.3.1	ACT	Identify civic/community groups with shared interest	Executive	March 1, 2020	December 31, 2024	60%	On-going
8.3.2	ACT	Prioritize and determine appropriate SLHA person(s) to engage the civic/community group (existing relationships, interest or passion in that area, etc.)	Executive	March 1, 2020	December 31, 2024	60%	On-going
8.3.3	ACT	Develop one-pager or other PR materials that highlights SLHA's role in community and potential partnership opportunities	Marketing	September 1, 2021	December 31, 2024	60%	On-going
8.3.4	ACT	Seek to formalize partnership through standardized MOU process or other arrangements as necessary	Resident Initiatives	August 15, 2020	December 31, 2024	60%	On-going
	ACT	Develop internal standards and protocols for managing relationships with partners (e.g. point of contact, frequency of outreach, type of outreach, etc.)	Resident Initiatives	July 1, 2020	December 31, 2024	60%	On-going
8.4	STR	Utilize website and social media more effectively to communicate with stakeholders	Marketing	January 1, 2020	December 31, 2024	65%	Underway
8.4.1	ACT	Post to social media updates on SLHA programs, events, success stories, etc.	Marketing	January 1, 2020	December 31, 2024	60%	On-going
8.4.2	ACT	Continue development of relevant website content to increase awareness of SLHA activities	Marketing	January 1, 2020	December 31, 2024	80%	Underway
8.4.3	ACT	Develop internal guidelines for sharing content across digital platforms	Marketing	June 1, 2021	November 30, 2022	20%	Underway
8.4.4	8.4.5	Connect social media feeds to SLHA website (you can see social media posts on site)	Marketing	June 1, 2021	December 31, 2021	100%	On-going
8.5	STR	Create transparency plan that provides guidance to public on SLHA communication practices	Executive	July 1, 2021	June 1, 2022	5%	Not Started
8.5.1	ACT	Research and identify best practices on communication transparency between agencies and the public	Executive	July 1, 2021	December 30, 2021	20%	On-going
8.5.2	8.5.3	Convene meeting of residents to obtain feedback (e.g. TAB, resident commissioners)	Executive	January 30, 2022	March 1, 2022	0%	Not Started
8.5.3	ACT	Create draft communication transparency plan	Executive	March 1, 2022	May 1, 2022	0%	Not Started
8.5.4	ACT	Submit draft Plan for comment and update as appropriate (Board meeting packet)	Executive	June 1, 2022	June 1, 2022	0%	Not Started
8.6	STR	Update communications plan to include crisis communication	Marketing	July 1, 2020	April 1, 2022	67%	Complete
8.6.1	ACT	Research and identify best practices for crisis communications	Marketing	July 1, 2020	August 15, 2020	100%	Complete
8.6.2	ACT	Create draft communications plan with crisis communication component	Marketing	December 31, 2021	March 1, 2022	100%	Complete
8.6.3	ACT	Submit draft Plan for comment and update as appropriate (Board meeting packet)	Executive	March 1, 2022	April 1, 2022	0%	Not Started
8.7	STR	Streamline and simplify forms and documents used by residents, HCV participants and landlords	Asset Management, HCV	July 1, 2021	December 31, 2021	17%	Underway
8.7.1	ACT	Edit and submit digital files for current forms in use to Marketing for updating	Asset Management, HCV	July 1, 2021	July 30, 2022	50%	Underway
8.7.2	ACT	Forms to be re-designed and reviewed for approval	Marketing, Legal, Executive	July 1, 2021	July 30, 2022	0%	Not Started
8.7.3	ACT	Approved forms distributed and linked to website	Marketing	July 1, 2021	July 30, 2022	0%	Not Started
8.8	STR	Develop relationships within affordable housing industry to share knowledge and best practices	Everyone	January 1, 2020	December 31, 2024	30%	Underway
8.8.1	ACT	Attend local, regional and national convenings/conferences	Everyone	January 1, 2020	December 31, 2024	60%	Underway
8.8.2	ACT	Serve on national committees and boards related to affordable housing	Executive	January 1, 2022	December 31, 2024	0%	Not Started
8.9	STR	Strengthen internal communication	Everyone	June 1, 2021	December 31, 2024	10%	Underway
8.9.1	ACT	Issue quarterly staff newsletters that highlight status of current activities	Marketing	June 1, 2021	December 31, 2024	60%	On-going



St. Louis Housing Authority  
2020 - 2024 Strategic Plan Goal Tracker

8.10.	STR	Create culture of employee engagement and ownership	HR	December 1, 2021	December 31, 2024	40%	On-going
8.10.1	ACT	Revive event committee as Employee Appreciation Committee	HR	December 1, 2021	December 31, 2024	40%	On-going
9	9	Improve quality of life of PH residents and HCV participants through services and programs				45%	Underway
9.1	STR	Expand resources for resident services, including funding for additional resident services staff	Resident Initiatives	December 1, 2019	December 31, 2024	50%	Underway
9.1.1	ACT	Refer to Strategy 6.1	Resident Initiatives	December 1, 2019	December 31, 2024	50%	Underway
9.1.2	STR	Continue implementation of Human Services Plan	Resident Initiatives	October 1, 2019	December 31, 2024	35%	Underway
9.1.3	ACT	Secure MOUs and Partner Agreements for defined services	Resident Initiatives	October 1, 2019	December 31, 2024	30%	Underway
9.1.4	ACT	Expand Program Coordinating Committee	Resident Initiatives	October 1, 2019	December 31, 2024	40%	Underway
9.2	STR	Prepare for transition for completion of Jobs Plus program	Resident Initiatives	April 1, 2020	September 30, 2022	100%	Complete
9.2.1	ACT	Submit close-out documents including SF-425 financials, Demographic Report, JPEID, Budget Explanation and Narrative as defined in HUD grant agreement	Resident Initiatives	April 1, 2020	June 30, 2021	100%	Complete
9.3	STR	Expand residents' access to technology	IT	October 1, 2021	September 30, 2022	50%	Underway
9.3.1	ACT	Implement Rent Café profiles for clients	IT	January 1, 2020	December 31, 2022	50%	Underway
9.4	STR	Complete improvements to Al Chappelle Community Center and increase utilization of center for programs and events	Resident Initiative & Development & Modernization	October 1, 2020	December 31, 2024	30%	Underway
9.4.1	ACT	Create or improve partnerships with social service agencies (see 6.4.4; 9.2.1)	Resident Initiatives	October 1, 2020	December 31, 2024	30%	On-going
9.4.2	ACT	Utilization of the Resident Initiative Marketing Plan	Resident Initiatives	October 1, 2020	December 31, 2024	50%	On-going
9.4.3	ACT	Physical Improvements to the Al Chappelle Center and Clinton-Peabody Development	Development & Modernization	October 1, 2021	September 30, 2022	0%	Not Started
9.5	STR	Expand access of resident initiatives programs to HCV participants	Resident Initiatives	December 1, 2021	December 31, 2024	7%	Underway
9.5.1	ACT	Create marketing and communications plan specific to HCV	Resident Initiatives	December 1, 2021	June 30, 2022	10%	Underway
9.5.2	ACT	Inform and Educate SLHA staff of plan	Resident Initiatives	July 1, 2022	December 31, 2022	0%	Not Started
9.5.3	ACT	Distribute RI information to all HCV households annually	Resident Initiatives	December 31, 2021	December 31, 2024	10%	Underway

**St. Louis Housing Authority**  
**FY 2022 Annual Plan**

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**ATTACHMENT #15**

**Section B.6 – Resident Advisory board (RAB)**

**Comments and Responses**

**THIS INFORMATION IS TO BE INSERTED AFTER THE PUBLIC HEARING**





**Certification by State or Local  
Official of PHA Plans Consistency  
with the Consolidated Plan or  
State Consolidated Plan  
(All PHAs)**

U. S Department of Housing and Urban Development

Office of Public and Indian Housing

OMB No. 2577-0226

Expires 3/31/2024

**Certification by State or Local Official of PHA Plans  
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Justin Jackson, the Director of Housing  
*Official's Name* *Official's Title*

certify that the 5-Year PHA Plan for fiscal years \_\_\_\_\_ and/or Annual PHA Plan for fiscal  
year 2022 of the The St. Louis Housing Authority  
is consistent with the

*PHA Name*

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair  
Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

The City of St. Louis Missouri

*Local Jurisdiction Name*

pursuant to 24 CFR Part 91 and 24 CFR §§ 903.7(o)(3) and 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or  
State Consolidated Plan.

The St. Louis Housing Authority's (SLHA's) Fiscal Year 2022 Agency Plan (Annual Plan) is consistent with the City of St. Louis's Consolidated Plan because its business strategies are aligned to provide programs that benefit the very-low and low-to moderate-income households in the City. SLHA and the City strive to accomplish this through the prevention or elimination of neighborhood blight and by providing safe, decent, affordable housing choices throughout the community. The SLHA and City continue to pursue and invest in opportunities for mixed-finance partnerships with private developers, investors, and community residents to develop affordable housing choices to improve the quality and energy efficiency of housing in the jurisdiction.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Executive Director:

Name Board Chairperson:

Signature

Date

Signature

Date

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

**Certifications of Compliance with  
PHA Plan and Related Regulations  
(Standard, Troubled, HCV-Only, and  
High Performer PHAs)**

**U.S. Department of Housing and Urban Development**  
Office of Public and Indian Housing  
**OMB No. 2577-0226**  
**Expires 3/31/2024**

**PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations  
including PHA Plan Elements that Have Changed**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the \_\_\_ 5-Year and/or X Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 2022, in connection with the submission of the Plan and implementation thereof:*

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
  - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
  - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
  - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
  - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
  - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
  - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
  10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
  11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
  12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
  13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
  14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
  15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
  16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
  17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
  18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
  19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
  20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
  21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
  22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

St. Louis Housing Authority (SLHA)  
 PHA Name

MO001  
 PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2022

5-Year PHA Plan for Fiscal Years 20     - 20    

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Name of Executive Director		Name Board Chairman	
Alana C. Green		Sal F. Martinez	
Signature	Date	Signature	Date
	7/15/2022		7/15/2022

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The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

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**St. Louis Housing Authority**  
**FY 2022 Annual Plan**

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**ATTACHMENT #18**

**Section B.1 (c) – Deconcentration of Poverty and Income Mixing [24 CFR 903.1 and 903.2]**

Deconcentration of poverty and income mixing is a policy that allows PHA's to bring higher income tenants into lower income developments and lower income tenants into higher income developments. In accordance with 24 CFR Part 903, a Deconcentration and Income Mixing Policy is required as a part of SLHA's Admissions and Continued Occupancy Policy (ACOP). SLHA's Deconcentration and Income Mixing Policy is included in Chapter 6 of the ACOP – Tenant Selection, Section 6.4.

Developments subject to the deconcentration of poverty and income mixing requirements are referred to as "covered" developments". Covered developments include general occupancy (or family) public housing developments.

Developments not subject to the requirement include public housing developments:

- with-fewer than 100 public housing units;
- designated specifically for elderly and/or disabled residents;
- approved for demolition or for conversion to tenant-based assistance; and
- approved mixed-finance developments using HOPE VI or public housing funds.

**Table 2 - Average Income of Public Housing Developments** includes a list of all SLHA developments, their annual income and if they are subject to the Deconcentration and Income Mixing Requirements.

SLHA will determine the average income of families in all covered developments on an annual basis. SLHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85 percent to 115 percent of the average family income. The results of SLHA's analysis are summarized on **Table 1 - Average Income of Families in All Covered Developments**.

If covered developments have an average income outside the EIR, SLHA will then determine whether or not these developments are consistent with its local goals and annual plan. If the development is not consistent with local goals and annual plan the SLHA may skip a family on the waiting list to reach another family in an effort that would further the goals of deconcentration.

For FY 2022, SLHA revised its methodology used to complete the income analysis. In prior year's the average annual income was adjusted for bedroom sizes for each development. While permitted by HUD, this adjustment was not included in SLHA's policy in the ACOP. Going forward, the average annual income number will be used to streamline the analysis and present a more effective analysis.

**Deconcentration of Poverty and Income Mixing**  
**Table 1: Average Income of Families in Covered Developments**

<b>Development Name</b>	<b>Average Income</b>	<b>Average Income ALL Developments</b>	<b>% of Income</b>	<b>Established Income Range (85% - 115%)</b>
Clinton Peabody	\$6,901	\$11,525	60%	Below
James House	\$8,040	\$11,525	70%	Below
Euclid Plaza	\$8,190	\$11,525	71%	Below
Northside Scattered Sites	\$12,183	\$11,525	106%	Within
Parkview	\$9,403	\$11,525	82%	Below
Southside Scattered Sites	\$9,877	\$11,525	86%	Within
Badenhaus/Badenfest	\$8,596	\$11,525	75%	Below
LaSalle Park	\$13,908	\$11,525	121%	Within
Kingsbury Terrace	\$11,349	\$11,525	98%	Within
<b>ALL Covered Developments</b>	<b>\$9,941</b>	<b>\$11,525</b>	<b>86%</b>	-
<b>ALL DEVELOPMENTS</b>	<b>\$11,525</b>	<b>\$11,525</b>	<b>100%</b>	-

\*As of February 28, 2022

**Deconcentration of Poverty and Income Mixing**  
**Table 2: Average Income of Public Housing Developments\***

Dev. Number	Development Name		Count of Families	Average Income
020	Clinton-Peabody	Covered	222	\$6,901
100	James House	Covered	119	\$8,040
132	Euclid Plaza	Covered	105	\$8,190
150	Towne XV (NSSS)	Covered	7	\$16,997
160	McMillan Manor (NSSS)	Covered	10	\$7,469
170	West Pine	< 100 Units	94	\$10,170
190	Parkview	Covered	268	\$9,403
220	Lafayette Apartments (SSSS)	Covered	22	\$9,962
230	California Gardens (SSSS)	Covered	23	\$8,038
260	Page Manor (NSSS)	Covered	9	\$7,653
280	Badenhaus Elderly (BH/BF)	Covered	96	\$8,066
340	LaSalle Park	Covered	134	\$13,908
350	Armand & Ohio (SSSS)	Covered	4	\$14,804
370	Cochran Plaza	<100 Units	66	\$11,423
380	Folsom (SSSS)	Covered	3	\$3,176
381	Samuel Shepard (NSSS)	Covered	8	\$9,569
382	Marie Fanger (SSSS)	Covered	5	\$17,600
383	Cupples (NSSS)	Covered	3	\$15,782
384	Hodiamont (NSSS)	Covered	10	\$7,003
390	Badenfest Elderly (BH/BF)	Covered	20	\$11,137
410	South Broadway (SSSS)	Covered	10	\$15,235
411	Walnut Park (NSSS)	Covered	9	\$21,682
412	Lookaway (NSSS)	Covered	16	\$12,020
420	Lafayette Townhomes (SSSS)	Covered	26	\$8,625
421	Tiffany Turnkey (SSSS)	Covered	25	\$9,123
440	Murphy Park I	Mixed Finance/HOPE VI	75	\$13,804
450	Murphy Park II	Mixed Finance/HOPE VI	54	\$17,499
460	Murphy Park III	Mixed Finance/HOPE VI	61	\$13,321
470	King Louis Square I	Mixed Finance/HOPE VI	33	\$15,462
480	Les Chateau	Mixed Finance/HOPE VI	35	\$14,314
490	King Louis Square II	Mixed Finance/HOPE VI	38	\$14,219
500	Renaissance Place @ Grand I	Mixed Finance/HOPE VI	57	\$22,209
510	McMillan Manor II (NSSS)	Covered	14	\$14,555
520	King Louis Square III	Mixed Finance/HOPE VI	22	\$15,846
540	Sr. Living @ Renaissance Place	Mixed Finance/HOPE VI	75	\$13,078
550	Gardens at Renaissance Place	Mixed Finance/HOPE VI	22	\$10,521
560	Cahill House	Mixed Finance/HOPE VI	81	\$13,006
570	Renaissance Place @ Grand II	Mixed Finance/HOPE VI	30	\$13,287
580	Cambridge Heights	Mixed Finance/HOPE VI	33	\$15,828
590	Renaissance Place @ Grand III	Mixed Finance/HOPE VI	51	\$16,583
600	Cambridge Heights II	Mixed Finance/HOPE VI	33	\$16,715
620	Sr. Living @ Cambridge Heights	Mixed Finance/HOPE VI	72	\$12,782
630	Arlington Grove	Mixed Finance/HOPE VI	64	\$12,304
640	North Sarah	Mixed Finance/HOPE VI	58	\$10,955
650	North Sarah II	Mixed Finance/HOPE VI	41	\$12,238
660	North Sarah III	Mixed Finance/HOPE VI	33	\$13,342
661	Kingsbury Terrace	Covered	117	\$11,349
<b>Grand Total</b>			<b>2413</b>	<b>\$11,525</b>
<b>All Covered Developments</b>			<b>1071</b>	<b>\$9,941</b>

<b>Combined Developments</b>				
NSSS	Northside Scattered Sites	Covered	86	\$12,183
SSSS	Southside Scattered Sites	Covered	118	\$9,877
BH/BF	Badenhaus/Badenfest	Covered	116	\$8,596

\*As of February 28, 2022

**St. Louis Housing Authority**  
**FY 2022 Annual Plan**

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**Table of Attachments**

**Other Documents and /or Certifications not included in the Annual Submission  
(Referencing Standard Template Form HUD-50075-ST)**

Attachment #18	Section B.1 (b) – Deconcentration Analysis
Attachment #19	Section B.2 (b) – Designated Housing Narrative
Attachment #20	Affirmatively Furthering Fair Housing Analysis
Attachment #21	SLHA Board Resolution – Agency Plan Submission
Attachment #22	SLHA Board Resolution – Five-year Capital Fund Plan



**St. Louis Housing Authority**  
**FY 2022 Annual Plan**

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**ATTACHMENT #19**

**Section B.2 (b) – PHA Plan Update – Plan Elements Revised**

**Item 4 – Designated Housing Statement**

Designated housing consists of four (4) developments, Les Chateaux (MO001-000048) – 40 units, Senior Living at Renaissance Place (MO001-000054) – 75 units, Cahill House (MO001-000056) – 80 units and Senior Living at Cambridge Heights (MO001-000062) – 75 units. SLHA requested a two-year extension of the Designated Housing Plan and received HUD approval on July 22, 2020. SLHA is eligible to extend the plan for additional 2-years in September 5, 2022.

In addition, SLHA will submit an application for designated senior-only housing for the Parkview development (MO001-000019) in FFY 2023.



**U.S. Department of Housing and Urban Development**

St. Louis Field Office  
Robert A. Young Federal Building  
1222 Spruce Street – Room 3.203  
St. Louis, Missouri 63103-2836

July 22, 2020

VIA ELECTRONIC MAIL

Ms. Alana Green  
Executive Director  
St. Louis Housing Authority  
3520 Page Boulevard  
St. Louis, MO 63106  
[agreen@slha.org](mailto:agreen@slha.org)

Dear Ms. Green:

Our office has reviewed your renewal application for existing Designated Housing at the St. Louis Public Housing Authority (PHA) sites:

MO001-0000062	Senior Living at Cambridge Heights	75 units
MO001-0000056	Cahill House	80 units
MO001-0000054	Senior Living at Renaissance Place	75 units
MO001-0000048	Les Chateaux	40 units
Total Units		270 units

Based on the review by the Public and Indian Housing Division (PIH) and the Fair Housing Equal Opportunity Division (FHEO), the Designated Housing Plan is approved. The Plan is approved for a period of two years and will need to be renewed by September 5, 2022.

If you have any questions regarding this matter, please contact Anita Hagerman, Public Housing Revitalization Specialist, at 314-418-5227 or via email at [Anita.L.Hagerman@hud.gov](mailto:Anita.L.Hagerman@hud.gov).

Sincerely,

7/22/2020

X

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Craig Dobson  
Director, Office of Public Housing  
Signed by: CRAIG DOBSON

**St. Louis Housing Authority**  
**FY 2022 Annual Plan**

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**ATTACHMENT #20**

**Affirmatively Further Fair Housing Analysis**

The Affirmatively Further Fair Housing Analysis was submitted to HUD for review on October 21, 2013. HUD has provided no response to the submission. Based on SLHA very limited resources, it has chosen not to update the analysis on a piecemeal basis, but to update the analysis once it receives HUD's comments.



ST. LOUIS  
**HOUSING**  
AUTHORITY

Affirmatively Furthering Fair Housing Analysis

## **I. Introduction**

As a public housing authority (PHA), the St. Louis Housing Authority (SLHA) is required to submit an annual Agency Plan to HUD for approval, in accordance with the requirements of 24 CFR §903. As part of the Agency Plan, SLHA is required to certify that it complies with certain civil rights requirements and certify that it will affirmatively further fair housing (24 CFR §903.7 (o)). To be considered in full compliance with the affirmatively furthering fair housing requirements, a PHA needs to fulfill the requirements of 24 CFR §903.2(b) and;

1. Examine its programs or proposed programs;
2. Identify any impediments to fair housing choices within those programs;
3. Address those impediments in a reasonable fashion in view of the resources available;
4. Work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require PHA involvement; and
5. Maintain records reflecting these analyses and actions.

This document provides the required documentation to show SLHA's full compliance with the requirements to affirmatively further fair housing.

## **II. Fulfill the Requirements of 24 CFR §903.2(b)**

Under the civil rights certification requirements at 24 CFR 903.7(o)(3), SLHA is required to fulfill the requirements of 24 CFR 903.2(b). 24 CFR §903.2(b) contains provisions that identify which public housing developments are subject to the requirements for deconcentration of poverty. This section does not impose any specific requirements on PHAs. However, 24 CFR §903.2(c) does impose specific requirements for implementation of deconcentration of poverty. SLHA assumes that the regulatory reference in 24 CFR §903.7(o)(3) is incorrect and that HUD's intention was to refer to the analysis requirements in 24 CFR §903.2(c). SLHA complies with HUD's deconcentration of poverty requirements under 24 CFR §903.2(c). The supporting documentation for the analysis is attached in Appendix A.

## **III. Examine SLHA's Programs and Proposed Programs**

Neither HUD nor the public housing regulations offer any guidance for what an examination of a PHA program or proposed program entails under 24 CFR 903.7(o)(3)(i). To try to determine what an examination of its program is supposed to contain, SLHA reviewed references on HUD's website and materials published by advocacy organizations. The review of these materials suggest that the examination should include the following:

- A review of demographic information of program participants and applicants in relationship to the demographics of the community.

- An analysis of racially and ethnically concentrated areas of poverty in SLHA programs.
- A review of housing needs across protected classes.

SLHA has examined each of the three items as discussed below:

### 1. Demographic Review

SLHA operates two major HUD funded programs, public housing and Housing Choice Vouchers. The demographic information is shown in Tables 1-5 below.

**Table 1  
Racial Composition of Programs**

Race	Public Housing				Housing Choice Vouchers			
	HOH	HOH %	Total Family Members	Total Family Members %	HOH	HOH %	Total Family Members	Total Family Members%
White	49	1.84%	61	1.02%	266	4.21%	409	2.46%
Black	2,605	97.68%	5,749	96.33%	6,026	95.36%	15,957	95.95%
Other	13	0.49%	158	2.65%	27	0.43%	262	1.58%

**Table 2  
Age of Participants in SLHA Programs**

Age	Public Housing		Housing Choice Vouchers	
	Total Family Members	Total Family Members %	Total Family Members	Total Family Members%
1-17	2,630	44.07%	8,475	50.96%
18-61	2,711	45.43%	7,301	43.90%
62 and over	619	10.37%	848	5.10%

**Table 3  
Income Sources in SLHA Programs**

Income Source	Public Housing		Housing Choice Vouchers	
	Number of Families	Percentage	Number of Families	Percentage
SSI	628	23.59%	1,752	27.75%
SS	948	35.61%	1,910	30.26%
Pension	162	6.09%	193	3.06%
TANF	226	8.49%	587	9.30%
Employment	842	31.63%	2,323	36.80%

**Table 4  
Average Income in SLHA Programs**

Public Housing			Housing Choice Vouchers		
Average Income	Average Family Size	Percentage of Median	Average Income	Average Family Size	Percentage of Median
\$10,734	2.24	19.38%	\$11,447	2.63	18.39%

**Table 5**  
**Disabled in SLHA Programs<sup>1</sup>**

Public Housing	Housing Choice Vouchers
Percentage of Families Containing a Member with a Disability	Percentage of Families Containing a Member with a Disability
24.78%	20.07%

Both the public housing and HCV programs have long waiting lists. Families are allowed to be on multiple waiting lists at the same time. Therefore, the demographics for waiting list of both programs are combined and shown in Tables 6- 10 below.

**Table 6**  
**Racial Composition of the Waiting List<sup>2</sup>**

Race	HOH	HOH %	Total Family Members	Total Family Members %
White	138	1.23%	238	0.89%
Black	11,023	98.03%	15,957	98.53%
Other	83	0.74%	262	0.57%

**Table 7**  
**Age of Participants on the Waiting List**

Age	Total Family Members	Total Family Members %
1-17	15,694	48.99%
18-61	15,608	48.72%
62 and over	649	2.03%

**Table 8**  
**Income Sources of Families on the Waiting List**

Income Source	Number of Families	Percentage
SSI	1,696	13.02%
SS	1,423	10.92%
Pension	85	0.65%
TANF	2,862	21.96%
Employment	4,972	38.16%

**Table 9**  
**Average Income of Families on the Waiting List**

Average Income	Average Family Size	Percentage of Median
\$8,440	2.45	15.24%

<sup>1</sup> The number of persons with a disability is based on the number of persons receiving SSI. As SLHA is not allowed to inquire regarding the nature of the disability, SLHA has no data on the number of individuals that need special features in their unit.

<sup>2</sup> The last time the HCV waiting list was opened in 2007, a short form pre-application was taken. This process did not require the identification of racial composition for family members. Therefore, a significant number of family members are listed as race unidentified. For the purpose of this analysis, unidentified race is not considered.

**Table 10**  
**Disabled Families on the Waiting List<sup>3</sup>**

Number of Families Claiming a Disability	Percentage of Families Claiming a Disability
933	2.91%

To compare SLHA programs to the surrounding community, SLHA used the Affirmatively Furthering Fair Housing (AFH) performed by the City of St. Louis as its data source. It should be noted that the City’s AFH was completed in March 2012, but is yet to be approved by HUD. The AFH states the following information.

Race

The City of St. Louis is a racially diverse city with whites and African Americans being the two largest racial or ethnic groups. The City has had an African American majority population since the 2000 Census. The white population, representing a bare majority of the city in the 1990 Census, has declined dramatically from its post-war population peak. In 1950, over 700,000 white residents called the city home. By 2010, this number had dropped fully 80% to 140,000. The 1980 Census showed the first drop in the African American population. This trend has continued and has accelerated, with the 2010 Census showing a faster decline in the African American population than in the white population for the first time. In fact, despite an 8.1% decline of the white population between 2000 and 2010, the share of this population actually inched up from 43.8% to 43.9%.

Since the 1970s, the North Side has been largely African-American; while the South Side was predominantly white. The 2010 Census data reveals a growing and unprecedented level of integration in the southern portion of the City, while the northern section remains predominately African-American. The African American population grew most significantly in the south central and southeastern portions of the City. The share of African Americans also increased, to a lesser extent, in each of the southwest St. Louis neighborhoods, as well as in the northern extremes of the city. African American population declines were witnessed most heavily in several South St. Louis neighborhoods. The pattern is reversed for the white population, with whites showing substantial percentage gains in these areas and losses in the extreme southern and northern portions of the City.

Populations of other races and ethnicities reside largely in the southern half of the City. Hispanics tend to live in the southeastern portion of the city, with Asians residing primarily in south-central neighborhoods or the central corridor (e.g., Central West End). Most other racial groups are very small in number and constitute a small percentage of the overall population.

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<sup>3</sup> The number of disabled families is based on the number of families claiming a disability on the application.



The Racial Population Comparison (Table 11) shows the population breakdown by race of St. Louis City, St. Louis County, and the entire State of Missouri. St. Louis City and St. Louis County are separate political jurisdictions. St. Louis City and County taken together contain 22% of the population of Missouri. There are some similarities across the three jurisdictions. For instance, the Asian population is 2.9% of St. Louis City, 3% of St. Louis County, and 2% of the state as a whole, showing a very slight urban concentration. Looking at the white (non-Hispanic) and African American populations, however, one sees a distinct difference when comparing the three jurisdictions. Only 11% of the population of Missouri is African American, but the percentages increase in the population centers of St. Louis County (23%) and St. Louis City (49%). St. Louis City is the only county-equivalent (and the only major city) in the state of Missouri with the African-American population as the largest racial group.

**Table 11**  
**Racial Population Comparison**

	St. Louis City		St. Louis County		Missouri	
Total Population	319,294		998,954		5,988,927	
White (non-Hispanic)	134,702	42.2 %	687,984	69%	4,850,748	81%
African American	156,389	49.0 %	231,801	23%	687,149	11%
American Indian	684	0.2%	1,632	0.2%	24,062	0.4%
Asian	9,233	2.9%	34,466	3%	97,221	2%
Two or More Races	6,616	2.1%	16,587	2%	106,142	2%
Other	540	0.2%	1,460	0.1%	11,135	0.2%
Hispanic	11,130	3.5%	25,024	3%	212,470	4%

### Age

The population of St. Louis is comprised mostly of adults age 20 and over (75.5%), with 15.6% of the population being over the age of 60. The age spread for the City of St. Louis has some variations when compared to St. Louis County and the State of Missouri. St. Louis County and the State of Missouri are very similar when comparing the percentages in each age category, with the largest spread being 1.2%. The City's population makeup by age differs from that of the other two jurisdictions. The City has higher populations of people in their 20s and 30s, but lower percentages of people under 20 and over 60.

There has been a pronounced loss of children in the City over the past decade, except for the areas near downtown that experienced significant growth. The City lost roughly a third of its population age 5-14 from 2000 to 2010. Still, 67,539 children (under age 18) lived in the City as of April 1, 2010.

The young population is concentrated in the northern and southeastern sections of the city where the highest poverty rates exist. The Central Corridor has relatively few children.

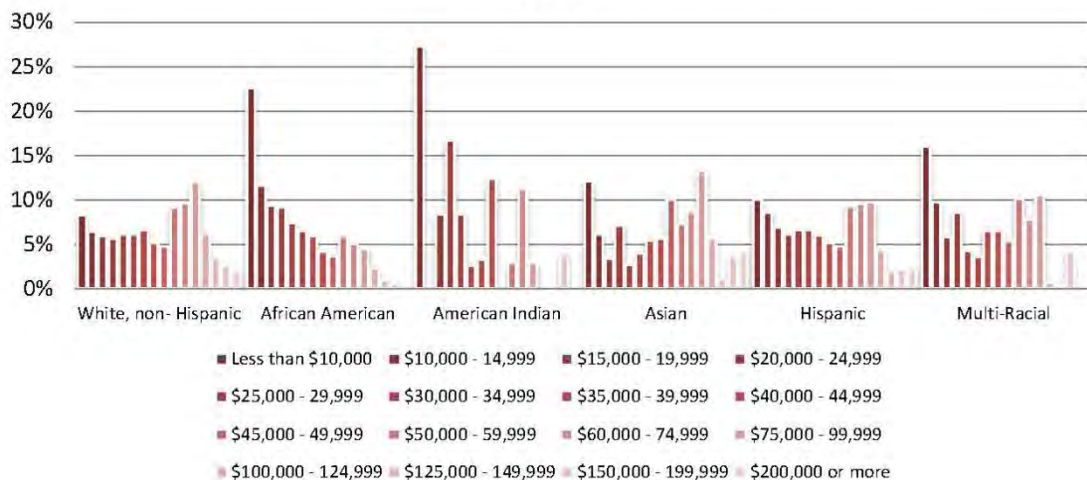
The elderly population consists of citizens who are 65 years old or older. The aging population presents unique challenges for the City of St. Louis. At about 16% of the population, the elderly comprise a smaller proportion of the population in the City than in St. Louis County and the State of Missouri. However, over half the City's elderly population have some sort of disability, and many require housing modifications and/or attendant care. Many elders live alone and are dependent on social services and nursing care in order to remain in their homes.

Income

Income is one of the greatest determinants of housing access. In this measure, St. Louis ranks well below its surrounding states and its suburbs. According to the 2005-2009 ACS, the median household income in the City of St. Louis was \$34,227, considerably less than the median income for the entire state of Missouri of \$46,005 and far less than the median income for St. Louis County of \$57,502. The table below highlights the disparity in income between the City of St. Louis and St. Louis County. In the City, 38% of households earn less than \$25,000 per year whereas in the County, 19.5% of households earn less than \$25,000. The disparity is even greater at the upper end of the income spectrum. For example, 24.6% of households in St. Louis County earn more than \$100,000, compared to 9.7% in St. Louis City.

Income distribution has an impact on the demand for low income housing. This demand is especially high for minorities, as the graph below demonstrates the variance of household income between different races and ethnicities. African Americans and American Indians have a much higher percentage of the population living with very low incomes.

**Household Income Distribution in the City of St. Louis by Race/Ethnicity:  
2009**



## Disability

About 14% of the St. Louis City population has some disability, exceeding the percentage in St. Louis County (11%) (2009 ACS). Of the working age population, about 13% are disabled, well above St. Louis County's 9% population of working-age disabled persons. There is an even larger discrepancy when comparing the population over 65. The estimated number of disabled elders soars to almost 44% of all elderly persons in the City, compared to 33% in the County. This creates a large challenge for the municipality to address the needs of an older population that shows significant rates of disability. The AI includes the table below.

**Table 12**  
**Disabled Population**

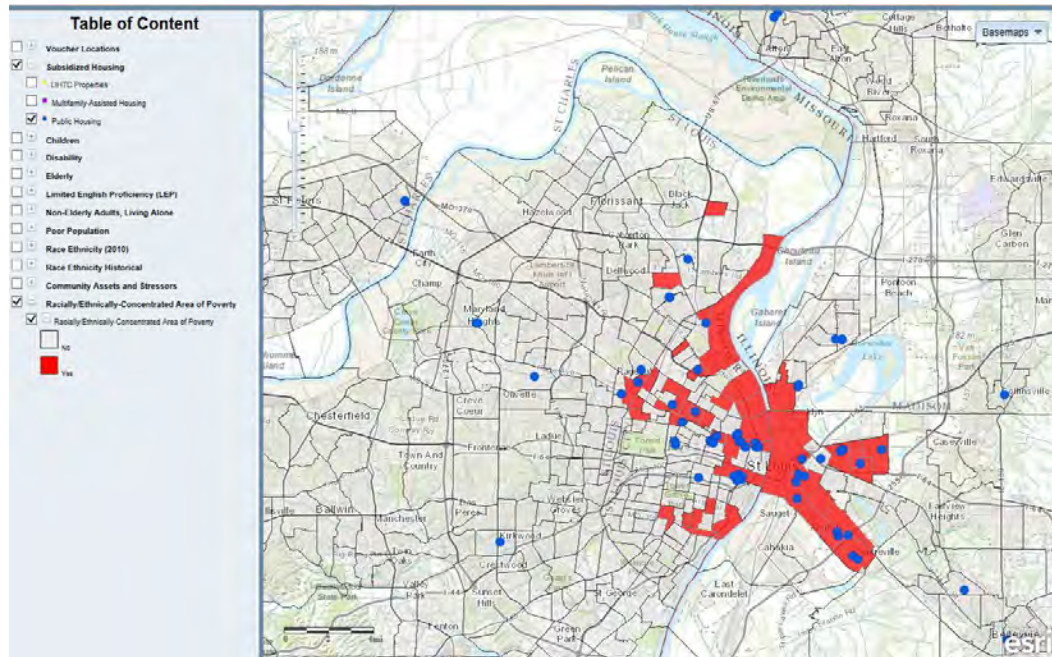
	Disabled Population from 18 to 64	Disabled Population 65 and Over
With any disability	13.4%	43.7%
With a hearing disability	1.6%	13.3%
With a vision disability	2.3%	8.7%
With a cognitive disability	6.8%	10.7%
With an ambulatory disability	7.2%	30.0%
With a self-care disability	2.7%	11.5%
With an independent living disability	5.1%	21.9%

It should be noted that neither the City's AI nor the American Community's Survey correlates disability and income, so it is difficult to determine the number of persons with a disability that qualifies for SLHA programs.

## 2. Analysis of Racially and Ethnically Concentrated Areas of Poverty in SLHA Programs

### Public Housing

SLHA currently has 2,852 units of public housing. As SLHA's jurisdiction for public housing is only the City of St. Louis, the analysis includes only the City. The distribution of the units, as it relates to racially and ethnically concentrated areas of poverty, are shown on the map below.



Of the 2,852 public housing units, 1,065 or 37% of the units are located outside census tracts identified as racially and ethnically concentrated areas of poverty and 1,787 or 63% of the units are located in census tracts racially and ethnically concentrated areas of poverty. Of the 1,787 units located in census tracts racially and ethnically concentrated areas of poverty, 693 or 24% of the units are located in mixed-finance/mixed-income developments.

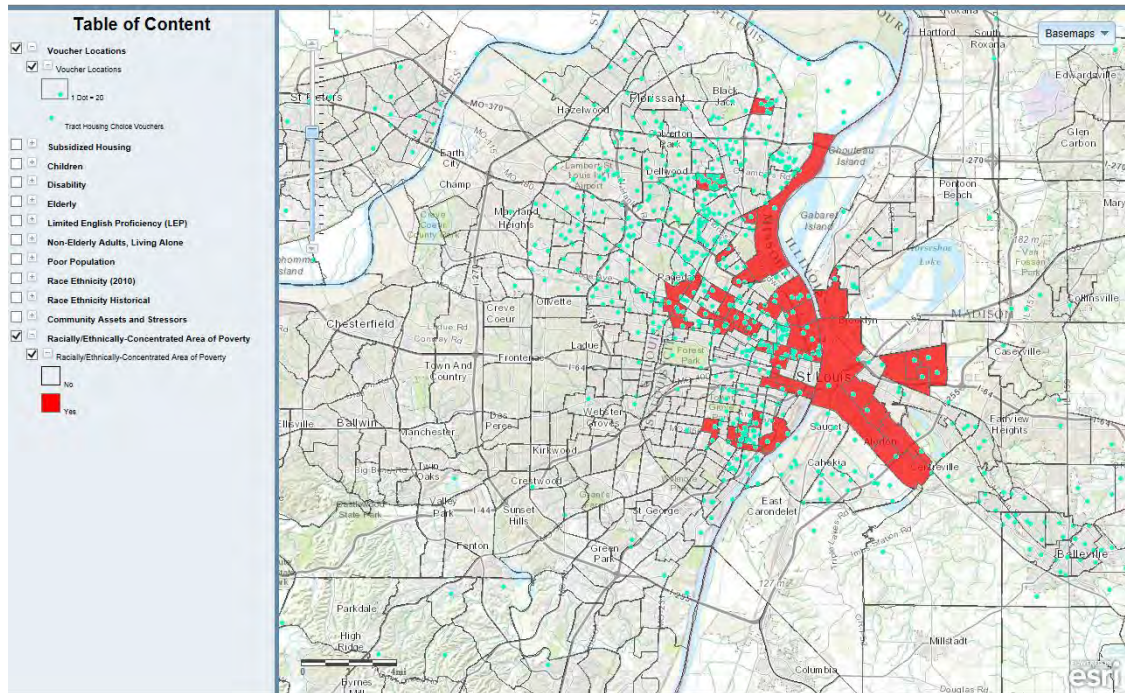
Since 1999, SLHA has steadily worked to reduce the number of public housing units in racially and ethnically concentrated areas of poverty. In 1999, 78% of the public housing units were located in census tracts racially and ethnically concentrated areas of poverty. Since that time, SLHA has demolished or disposed of 2,702 public housing units. Of those units, 2,575 were located in census tracts racially and ethnically concentrated areas of poverty. In 15 years, there has been a 15% reduction in units located in census tracts racially and ethnically concentrated areas of poverty. SLHA's Agency Plan has goals to continue to develop additional housing using the mixed finance method and to remove an additional 143 public housing units that are located in a census tract that is a racially and ethnically concentrated area of poverty.



## Housing Choice Vouchers

As of March 31, 2013, 6,739 vouchers were allocated to SLHA's HCV program. Of the allocated vouchers, 6,425 are currently leased. The utilization rate for the program is 101%. As the HCV program is budget based, SLHA must cease HCV lease-up until additional funding is available. Because of the mandatory federal budget cuts, SLHA estimates that by December 2013, 300 fewer families will be receiving HCV assistance. Further, if the 2014 appropriation levels remain at 2013 levels, an additional 300 households will be eliminated from the HCV program.

Unlike public housing, SLHA's jurisdiction for HCV is not limited to St. Louis City. SLHA participates in a regional approach to the HCV program. The Housing Authority of St. Louis County also has a large HCV program. For many years, program participants of both housing authorities have been allowed to use their voucher in either the City or the County. This gives SLHA's HCV participants a much broader range of choices of housing areas. The distribution of the units, as it relates to racially and ethnically concentrated areas of poverty, are shown on the map below.



As the map indicates, many vouchers are currently utilized outside of racially and ethnically concentrated areas of poverty. An analysis shows that 3,095 of SLHA's vouchers are located in the County and 3,330 are located in the City. Of these vouchers, 1,593 or 24.79% are located in a racially and ethnically concentrated area of poverty. The concentration in the County is very low, with only 182 or 5.88% located in racially and ethnically concentrated areas of poverty. In the City, 1,411 vouchers or 42.73% are located in racially and ethnically concentrated areas of poverty.

The data shows that SLHA’s agreement with the County is effective in reducing racially and ethnically concentrated areas of poverty.

However, SLHA’s ability to continue its deconcentration efforts is severely impacted by mandatory budget cuts. To allow families the maximum mobility, SLHA has for many years adopted the highest allowable payment standard. Unfortunately, in the current Agency Plan, the requirements of mandatory federal budget cuts, known as sequestration, have forced SLHA to reduce its payment standard to close to the minimum allowable. This limits a family’s choice in housing, often forcing families to older, less desirable areas with less costly housing. These are areas more likely to be racially and ethnically concentrated areas of poverty. If the 2014 appropriation levels remain at 2013 levels, SLHA will be forced to keep the lower HCV payment levels in place to continue serving as many tenants as possible, leaving families fewer choices, but with some housing assistance rather than none.

**3. Housing Needs Across Protected Classes**

The City’s AI includes an Affordable Housing Needs table that analyzes income and rental data to determine the need for housing. The table reflects a great need for housing for the poorest residents and an over-supply of housing at the upper end of the cost spectrum.

Income	Households	Monthly Housing Costs	Number of Units	Net
Less than \$10,000	21,028	Less than \$300	12,016	-9,012
\$10,000 - 14,999	12,445	\$300 - 399	10,585	-1,860
\$15,000 - 24,999	20,885	\$400 - 599	29,038	8,154
\$25,000 - 34,999	18,310	\$600 - 799	27,608	9,298

The AI goes on to state that there are 37,103 extremely low-income households, with incomes at or below 30% of the area median income, in the City of St. Louis. More than 70% of extremely low-income households have one or more housing problems, such as cost burden, overcrowding and/or incomplete kitchen or plumbing facilities. The primary housing problem for this group is cost burden. The majority of these households are paying more than 30% of their household income for housing.

The AI identifies that there are 24,288 low-income households, with incomes between 30% and 50% of the area median income, in the City of St. Louis. About half of low-income households have some sort of housing problem. Almost 44% of

these households are paying more than 30% of their household income for housing and almost 11% are paying more than 50% of their household income for housing. The AI also states that there are 30,686 moderate-income households, with incomes between 50% and 80% of the area median income, in the City of St. Louis. Approximately 16% of these households are paying more than 30% of their household income for housing.

As the demographic information for the area shows, African-Americans and American Indians have a much higher percentage of the population living with very low incomes than other racial/ethnic groups. Therefore, the need is greatest among the African American and American Indian protected classes.

The AI for the City of St. Louis indicates that there is also a need for units with accessible features for persons with disabilities for the elderly and a smaller need for large families. SLHA's data indicates that the need for elderly housing is not as strong as the AI indicates because SLHA does not see the demand for elderly housing.

SLHA has four developments that are designated elderly only. While each has a waiting list, the lists are relatively short and always remain open. All of SLHA's other waiting lists are extremely long and most are closed. When they open, they generally open for very short periods of time and receive hundreds, sometimes thousands of applications. This leads SLHA to conclude that the need for elderly housing is being provided by the private market, limiting the demand on SLHA's units.

#### **IV. Identify Any Impediments to Fair Housing Choice Within SLHA's Programs**

As with the requirement for a PHA to examine its programs, there is very little HUD guidance on how a PHA is to identify the impediments to fair housing choice within its programs in order to satisfy the requirements of 24 CFR 903.7(o)(3)(ii). HUD's website states that PHAs may conduct their own AI or ensure their annual PHA Plans are consistent with the applicable jurisdiction's Consolidated Plan and AIs. As SLHA has extremely limited resources, it has chosen to use the AI performed by the City of St. Louis. As stated above, the City's AI was completed in March 2012, but is yet to be approved by HUD. The impediments to fair housing choice identified in the City's draft AI are as follows:

1. There are not enough rent-assisted units to meet the demand.
2. Residents often oppose the location of housing for protected classes in or near their neighborhoods, including rezoning for group homes for residents who are disabled.
3. The largest concentration of affordable housing units is located in areas that lack jobs and have schools that underperform.

4. Information about fair housing enforcement is not universally known to organizations working with people in protected classes.
5. Continuing uncertainty regarding the General Assembly's commitment to funding tax credit programs used to fund low-income housing construction and rehabilitation is leading to uncertainty in the public and private sectors about the future availability of these resources in the production of affordable housing.
6. There is a lack of a centralized method for distributing Community Development Block Grant (CDBG) funds to meet housing needs.
7. Occupancy permit requirements are unevenly applied across the City of St. Louis.
8. Real Estate Agents do not provide enough information about the amenities of the City of St. Louis to customers who want information about where to locate.
9. There has been a constriction in access to credit for low-income and minority borrowers.
10. Accessible housing units are not often available to people with disabilities.

Clearly, some of the impediments identified in the City's AI do not relate to SLHA programs. SLHA is not responsible for administration of the LIHTC program. Therefore, SLHA has little ability to impact Impediment 4. SLHA is not involved in the City's administration of the Community Development Block Grant (CDBG). Therefore, Impediment 6, which identifies the method of distribution of CDBG funds, is not relevant to SLHA. SLHA is not a real estate agent or a lender. Therefore, Impediments 8 and 9, which identify issues with information provided by real estate agents and issues with the availability of credit to low-income and minority buyers, are not relevant to SLHA. Instead, Impediments 1, 2, 3, 5, 7 and 10 are the only Impediments relevant to SLHA.

## **V. Address Those Impediments in a Reasonable Fashion in View of the Resources Available**

To address the impediments in a reasonable fashion, each relevant impediment is addressed separately.

### **1. Impediment 1**

Impediment: There are not enough rent-assisted units to meet the demand.

Impact: Many low-income residents have less access to quality housing.

Analysis: The analysis in the City's Draft AI states that there are 78,148 renter households in the City, 37% of which are cost burdened and 20% of which are severely cost burdened. When looking at extremely low-income, low-income, and



moderate income households, the situation is more dire. Approximately 73% of extremely low-income households, 49% of low-income households, and 22% of moderate-income households have one or more housing problems. The primary housing problem in each group is cost burden.

As of March 31, 2013, SLHA was assisting about 9,371 households, with over 15,000 families on the waiting list for public housing and for Housing Choice Vouchers (HCV). In September of 2000, SLHA was assisting 7,150 households. In the past 12 years, SLHA has increased the number of households served by 31% or over 2,200 households. According to the City's AI, even with this level of assistance, there are still approximately 20,000 households in need of such assistance that do not receive it.

SLHA's Agency Plan recognizes the need for more affordable housing. One of the SLHA goals is to increase the supply of affordable housing by building an additional 120 public housing units and obtaining an additional 250 Housing Choice Vouchers. However, the implementation of mandatory federal budget cuts, known as sequestration, may prevent SLHA from reaching its goal. The effects of sequestration have been particularly devastating to the HCV program. Because of the budget cuts, SLHA estimates that by December 2013, 300 fewer families will be receiving HCV assistance. Further, if the 2014 appropriation levels remain at 2013 levels, an additional 300 households will be eliminated from the HCV program. While SLHA will make every effort to increase the supply of affordable housing, lack of funding from HUD may prevent SLHA from serving additional households.

## **2. Impediment 2**

**Impediment:** Residents often oppose the location of housing for protected classes in or near their neighborhoods, including rezoning for group homes for residents who are disabled.

**Impact:** Resident resistance may influence policy makers who might otherwise support housing development for protected classes. Resistant resident successes may lead to a perceived sanctioning of residents who have negative attitudes toward protected classes and perpetuates an unwelcoming environment

**Analysis:** As the City's AI states, NIMBY is an acronym standing for Not In My Back Yard. NIMBYism, as it is known, is the opposition of residents to developments in their neighborhood that putatively cause crime, lower property values, or generally have a negative effect. The name derives from the fact that many NIMBYs do not necessarily object to the proposed development; they object to its location near their home (i.e., "not in their backyard"). NIMBYism is often used in the context of dangerous or unwanted land uses, such as environmental hazards, in addition to social concerns, such as low income or transitional housing. It is commonly referred to as a problem in public policy and development circles due to the fact that NIMBYs

are often opposed to such land uses on principle without considering any facts or additional information about the development in question.

The City's AI goes on to state that in order to find the most affordable developable parcels and encounter the least NIMBY-related resistance in the community, developers often locate affordable housing projects in areas that are severely impacted with respect to poverty. The AI goes on to recommend that potential NIMBYism issues should be addressed in the planning process of a development. The AI concludes that negative attitudes regarding affordable housing should be addressed with better information about successful housing initiatives and by including the residents in planning for affordable housing initiatives, which would include their input and concerns and provide a means to get quality information to the neighbors before rumors and innuendos can overcome a development.

SLHA's Agency Plan includes a goal to increase awareness and understanding of programs, services and successes. As part of this strategic goal, SLHA has an objective to develop a community education program. The purpose of the community education program is to provide information to the SLHA clients, vendors, stakeholders and the general public about successful SLHA housing initiatives and to break down negative stereotypes about subsidized housing. In addition, in all new developments, SLHA requires the developer to engage the community and obtain community input in the planning process.

### **3. Impediment 3**

**Impediment:** The largest concentration of affordable housing units is located in areas that lack jobs and have schools that underperform.

**Impact:** Steady employment is difficult to find and maintain for protected class members with few resources. It is difficult for families in protected classes to find affordable housing and obtain quality education for their children.

**Analysis:** The City's AI states that most of the current development of low-income housing is developed by private developers with LIHTC financing and with partial financing through the Affordable Housing Commission or the Community Development Agency. Since private developers initiate the process, site selection is more about ease of obtaining the land at a cost that the project can support and avoiding problems with the neighborhood. Another factor that should be considered is that funding sources favor investment in distressed communities. Affordable housing developments provide jobs and stability in neighborhoods that would have little investment, if not for public investment. The AI states that this practice has led to the creation of an area that is defined by poverty.

The AI goes on to recommend that the City set goals to encourage developers to choose sites in less poverty impacted areas, increase regional planning to distribute

low-income housing to areas with good jobs and transportation, and encourage creative partnerships that will invest in low income areas of the City.

The AI concludes that large scale interventions, with guidelines for mix-income housing and universal design, may offer the best hope for revitalization for largely depleted neighborhoods with a high percentage of vacant land.

SLHA's Agency Plan goal for increasing the supply of affordable housing using the mixed-finance method of development is consistent with the recommendations in the AI. SLHA's strategy focuses on revitalizing entire neighborhoods using public and private resources as a catalyst to bring more redevelopment and economic opportunities to the areas. This creates the large scale intervention that the AI recommends.

SLHA, in partnership with the City and private developers, has completed developments using this revitalization strategy in four neighborhoods in the City. In all those neighborhoods, the strategy has resulted in substantial private investments and positive change in the economic composition of the area. For example, the revitalization of the Near South Side (formerly known as Darst-Webbe) has resulted in over \$100 million of private investment in the area. As a result of the revitalization, retail and commercial businesses have returned to an area that had seen many decades of disinvestment. The economic composition of the residents has changed, with a mix of public housing residents and market rate residents. Renaissance Place at Grand (formerly Blumeyer) has seen the same results, with private investments of over \$63 million and an increase in average income of 40%.

Unlike a purely private development, SLHA and its development partners very carefully consider the location of the developments, as they relate to jobs and transportation. Five of the six neighborhoods where revitalization is complete or underway are located near major employment centers. Two are immediately adjacent to downtown, with a third less than half a mile from downtown. Two others are located in mid-town, adjacent to the arts district, a major university and a large VA medical center, all potential sources of employment. All the developments are located on bus lines, giving the residents access to public transportation. In addition, there is a wide variety of social, recreational, educational and health care facilities located near each of the neighborhoods.

Consistent with the recommendations of the AI, SLHA has used a variety of very creative partnerships to bring investment to low-income areas. SLHA and its development partners used New Market Tax Credits and Empowerment Zone funds to build a new office building for SLHA, which contains a bank and a coffee shop in the Renaissance Grand neighborhood. The group also used New Market Tax Credits and public housing community facilities funds to build a new early childhood education center that will serve the communities on the near north side of downtown. When complete, the facility will provide 156 children with a high level of early childhood education.

The AI also recommends increasing regional planning to disburse low-income housing. SLHA's jurisdiction for new development of affordable housing includes only the City of St. Louis. While SLHA agrees that there should be increased regional planning, SLHA cannot build affordable housing outside its jurisdiction. However, SLHA participates in a regional approach to the HCV program. The Housing Authority of St. Louis County also has a large HCV program. For many years, program participants of both housing authorities have been allowed to use their voucher in either the City or the County. This gives SLHA's HCV participants a much broader range of housing areas. For many years, SLHA adopted the highest allowable payment standard to facilitate the broadest range of housing choice possible.

Unfortunately, in the current Agency Plan, the requirements of mandatory federal budget cuts, known as sequestration, have forced SLHA to reduce its payment standard to close to the minimum allowable. This limits families' choices in housing, often forcing families to older, less desirable areas. These are the areas that are most likely to have a concentration of poverty. If the 2014 appropriation levels remain at 2013 levels, SLHA will be forced to keep the lower levels in place, leaving families with fewer choices. In a choice between continuing to provide assistance to current participants or providing families the maximum amount of choice in housing areas, SLHA opted for providing assistance to current participants. If the program is ever fully funded, SLHA will have to determine if it wants to assist more families or give current participants more choices.

The AI claims that the location of the majority of the low-income housing prevents residents from obtaining quality education for their children. It should also be noted that while the public schools in the City of St. Louis are generally low performing, there is a variety of educational choices for children to attend better schools. All students in the City have the option of applying to attend a magnet or charter school. These schools generally perform at a higher level than the traditional public schools. In addition, the children have the option of participating in the Voluntary Inter-district Choice program. This program will allow children to attend schools in the Parkway, Rockwood or Clayton school district. These school districts are all much higher performing districts than the City of St. Louis. These educational choices give residents access to educational facilities that are at least equivalent to the choices in non-impacted areas.

#### **4. Impediment 4**

Impediment: Information about fair housing enforcement is not universally known to organizations working with people in protected classes.

Impact: Fair Housing complaints may be under-reported.

Analysis: Information about fair housing enforcement is well known to SLHA. Through both its HCV Administrative Plan and public housing ACOP, SLHA makes every attempt to provide its stakeholders with the necessary information about fair housing enforcement.

The HCV Administrative Plan requires SLHA to take steps to ensure that families and owners are aware of applicable equal opportunity laws. As part of every family's oral briefing process, SLHA reviews information with HCV applicant families about equal opportunity requirements and the opportunity to rent in a broad range of neighborhoods. All applicable Fair Housing information and discrimination complaint forms are part of the voucher holder's briefing packet and available upon request. The owners' briefing includes information regarding Fair Housing requirements. In addition, the Housing Assistance Payments (HAP) contract, which all owners must sign to participate in the program, contains provisions that prohibit the owner from discriminating against any person because of race, color, religion, sex, national origin, age, familial status, sexual orientation, gender identity or disability.

SLHA's ACOP requires SLHA to take steps to inform public housing residents of all applicable civil rights laws. As part of the public housing orientation process, SLHA will provide information to public housing applicants about civil rights requirements. The ACOP further provides that if an applicant or resident advises SLHA that they believe that any family member has been discriminated against, SLHA will provide a copy of a discrimination complaint form to the complainant and provide the family with information on how to complete and submit the form to HUD's Office of Fair Housing and Equal Opportunity (FHEO).

SLHA provides training, coordinated through HUD's Office of Fair Housing and Equal Opportunity (FHEO), to the HCV staff and the management agents' staff at least annually. The purpose of the training is to make sure the staff is aware of their obligations complying with fair housing requirements.

## **5. Impediment 7**

Impediment: Occupancy permit requirements are unevenly applied across the City of St. Louis.

Impact: Tenants are renting properties that lack occupancy permits.

Analysis: The City's AI states that occupancy permits are one way that a municipality can protect the residents. They help control the quality of housing and limit overcrowding. Another benefit to occupancy permits is that tenants gain some leverage to have residences brought up to code and made safer before occupying these dwellings. The AI goes on to state that occupancy permits have a positive impact on fair housing.

While SLHA does not have the authority to issue occupancy permits, both the HCV and public housing programs have initial and annual inspection requirements and both programs have strict occupancy standards to prevent overcrowding. The annual inspection requirements review property quality much more often than an occupancy permit, which only requires an inspection at initial occupancy. SLHA inspection and occupancy standards remove this impediment to fair housing for participants in SLHA programs.

## **6. Impediment 10**

**Impediment:** Accessible housing units are not often available to people with disabilities.

**Impact:** Persons with disabilities needing accessible housing do not have free and equal access to housing.

**Analysis:** The City's AI states that there is a great need for accessible housing in the City of St. Louis. An estimated 14% of the population has a disability and 7.2% has an ambulatory disability. When looking at just the senior population of the City, approximately 44% have a disability and 30% have an ambulatory disability. This is a large population of residents who have a disability when compared to St. Louis County, where 9% of the population are residents with disabilities.

SLHA fully complies with the requirements of Section 504 and has more than the required number of accessible units. Of SLHA's current inventory of 2,852 units, 7.89% of the units are accessible for individuals with mobility impairment and 3.23% of the units are accessible for individuals with hearing and visual impairments. A list of SLHA's current units is provided in Appendix B.

In addition, the inventory includes four developments designed for elderly families. These developments were all designed using the principles of universal design. Some of the universal design features that are included are: adequate clearances in front of each appliance and working surfaces, faucets with single lever handles and shallow bowls, slip resistant smooth surface flooring and low pile carpet, lever door handles instead of door knobs, adjustable height closet rods, view windows with 36" or less sill height, mirror to backsplash behind bathroom sink, mixer valve with pressure balance and hot water limiter, electrical outlets, light switches and thermostats at accessible heights.

All ground floor units and elevator units are adaptable designed. This design includes: accessible building entrance on an accessible route, accessible common and public use area, usable doors, accessible route into and through a unit, accessible environmental controls, reinforced bathroom walls for grab bars and usable kitchens and bathrooms.

In addition, to the extent practical all entry doors and interior corridors are no less than 3'-0" wide and all interior doors are no less than 2'-10" wide, allowing 32" of clear passage space.

The more recent family developments at Arlington Grove and North Sarah also are designed using universal design principles, as well as meeting all the requirements of Section 504 and the Fair Housing Act. SLHA exceeds its requirements for accessible units and houses a large number of disabled families. The developments proposed in SLHA's Agency Plan will add to the supply of accessible units. In addition, SLHA's Agency Plan commits to applying for Non-Elderly Disabled ("NED") vouchers from HUD, if funding is available and it can identify a viable community partner.

Unfortunately, as with SLHA's goal to increase the supply of affordable housing, the implementation of mandatory federal budget cuts, known as sequestration, may prevent SLHA from being able to increase the supply of additional accessible units. If the 2014 appropriation levels remain at 2013 levels, there will likely not be funds available for NED vouchers or additional public housing units.

**VI. Work with Local Jurisdictions to Implement Any of the Jurisdiction's Initiatives to Affirmatively Further Fair Housing that Require PHA Involvement**

SLHA works closely with the various City development agencies, including the Community Development Agency, the Planning and Urban Design Agency, the St. Louis Development Corporation and the Affordable Housing Trust. SLHA participates in the City's Consolidated Plan process and the City verifies that SLHA's Agency Plan is consistent with the Consolidated Plan. The Planning and Urban Design Agency and the City's Department of Human Services were members of the SLHA Strategic Planning Committee that defined the goals and objectives presented in the Agency Plan. While the City's AI does not identify any jurisdictional initiatives that specifically require SLHA's involvement, as identified with each impediment discussed in Section V of this document, SLHA's Agency Plan and policies contain actions that will assist in reducing some of the impediments and affirmatively furthering fair housing.

**VII. Maintain Records Reflecting These Analyses and Actions**

This document will serve as the record of SLHA's completion of the analysis requirements of 24 CFR §903.7 (o). As a further record of its actions, SLHA will update the goals and objectives in the annual Agency Plan to document the progress on achieving the stated goals.

**Appendix A – Deconcentration Analysis**  
**(Reference Attachment 18 of the FY 2022 Agency Plan)**



**Appendix B – Section 504 Accessible Units under the ACC**

Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V			
MO1-2	MO1-020	Clinton-Peabody	1942	358	0	52	159	125	14	8	0	0	No	3.8	2	11	12							
		1002 Dillon				1											1							
		1234 Dillon				1											1							
		1302 Dillon				1											1							
		1136 Dillon					1										1							
		1517 Lasalle				1											1							
		1414 Lasalle						1									1							
		1462 Kealty					1										1							
		1400 Morrison				1											1							
		1416 Morrison						1									1							
		1424 Morrison					1										1							
		1440 Morrison				1											1							
		1401 Rutger				1											1							
		1411 Rutger						1									1							
		1425 Rutger					1										1							
		1441 Rutger				1											1	1						
		1474 Hickory						1									1							
		1400 Peabody				1											1							
		1432 Peabody				1											1							
		1434 Peabody				1											1							
		1465 Lasalle								1							1							
		1440 Castle					1										1							
		1245 S. 14TH					1										1							
		1408 Chouteau						1									1							
	<b>Totals</b>	<b>Clinton-Peabody</b>				<b>11</b>	<b>6</b>	<b>5</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>				<b>11</b>	<b>12</b>					<b>195</b>	<b>18</b>	
MO1-10	MO1-100	James House	1970	126	9	117	0	0	0	0	0	0	No	5	2	9	3							
		4310 S. FERDINAND																						
		UNIT 213				1											1							
		UNIT 313				1											1							
		UNIT 413				1											1							
		UNIT 513				1											1							
		UNIT 613				1											1							
		UNIT 713				1											1							
		UNIT 813				1											1							
		UNIT 913				1											1							
		UNIT 1013				1											1							
		UNIT 207				1												1						
		UNIT 307				1												1						
		UNIT 407				1												1						Rehab Comp 7-2012
	<b>Totals</b>	<b>James House</b>				<b>12</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>				<b>9</b>	<b>3</b>					<b>40</b>	<b>5</b>	
MO1-13B	MO1-132	Euclid Plaza Elderly	1973	108	10	95	3	0	0	0	0	0	No	3.8	2	10	0							
		5310 N. EUCLID																						
		UNIT 214				1											1							
		UNIT 308				1											1							
		UNIT 416				1											1							
		UNIT 509				1											1							

Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments	
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V				
		UNIT 616				1											1								
		UNIT 709				1											1								
		UNIT 816				1											1								
		UNIT 201				1											1								
		UNIT 307				1											1								
		UNIT 401				1											1								
	<b>Totals</b>	<b>Euclid Plaza Elderly</b>				<b>10</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>				<b>10</b>	<b>0</b>						<b>52</b>	<b>5</b>	
<b>MO1-15</b>	<b>MO1-150</b>	<b>Towne XV</b>	<b>1971</b>	<b>8</b>	<b>0</b>	<b>0</b>	<b>8</b>				<b>0</b>	<b>0</b>	No	<b>3.8</b>	<b>2</b>	<b>2</b>	<b>0</b>								
		1070 Hodiament					1										1								
		1074 Hodiament					1										1								
		1064 Hamilton					1										1								
		1060 Hamilton					1										1								
	<b>Totals</b>	<b>Towne XV</b>				<b>0</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>				<b>2</b>	<b>2</b>						<b>14</b>	<b>1</b>	
<b>MO1-16</b>	<b>MO1-160</b>	<b>McMillian Manor</b>	<b>1972</b>	<b>20</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>10</b>	<b>10</b>	<b>0</b>	<b>0</b>	<b>0</b>	No	<b>3.8</b>	<b>2</b>	<b>0</b>	<b>0</b>						<b>26</b>	<b>2</b>	
<b>MO1-17</b>	<b>MO1-170</b>	<b>West Pine</b>	<b>1971</b>	<b>99</b>	<b>0</b>	<b>94</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	Yes, 2004	<b>3.8</b>	<b>2</b>	<b>12</b>	<b>9</b>								
		<b>4490 WEST PINE</b>																							
		UNIT 207					1										1								
		UNIT 307					1										1								
		UNIT 407					1										1								
		UNIT 507					1										1								
		UNIT 607					1										1								
		UNIT 707					1										1								
		UNIT 807					1										1								
		UNIT 907					1										1								
		UNIT 1007					1										1								
		UNIT 201					1										1								
		UNIT 206					1										1								
		UNIT 306					1										1								
		UNIT 406					1										1								
		UNIT 506					1										1								
		UNIT 606					1										1								
		UNIT 706					1										1								
		UNIT 806					1										1								
		UNIT 906					1										1								
		UNIT 1006					1										1								
		UNIT 214						1									1								
		UNIT 414						1									1								
	<b>Totals</b>	<b>West Pine</b>				<b>19</b>	<b>2</b>									<b>12</b>	<b>9</b>					<b>38</b>	<b>2</b>		
<b>MO1-18</b>	<b>MO1-180</b>	<b>Kingsbury Terrace</b>	<b>1971</b>	<b>120</b>	<b>0</b>	<b>110</b>	<b>10</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	No	<b>3.8</b>	<b>2</b>	<b>10</b>	<b>3</b>								
		<b>5655 KINGSBURY</b>																							
		UNIT 201					1										1								
		UNIT 202						1									1								
		UNIT 301					1										1								
		UNIT 401					1										1								
		UNIT 501					1										1								

Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments	
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V				
		UNIT 601				1											1								
		UNIT 701				1											1								
		UNIT 801				1											1								
		UNIT 901				1											1								
		UNIT 1001				1											1								
		UNIT 208				1												1							
		UNIT 308				1												1							
		UNIT 303						1										1							Rehab Comp 4-2009
	<b>Totals</b>	<b>Kingsbury Terrace</b>			<b>0</b>	<b>11</b>											<b>10</b>	<b>3</b>					<b>29</b>	<b>5</b>	
<b>MO1-19</b>	<b>MO1-190</b>	<b>Parkview Elderly</b>	<b>1972</b>	<b>295</b>	<b>7</b>	<b>288</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	Yes, 2003	<b>3.8</b>	<b>2</b>	<b>48</b>	<b>20</b>								
		<b>4451 FOREST PARK</b>																							
		UNIT 201				1											1								
		UNIT 202				1											1								
		UNIT 301				1											1								
		UNIT 302				1											1								
		UNIT 401				1											1								
		UNIT 402				1											1								
		UNIT 501				1											1								
		UNIT 502				1											1								
		UNIT 601				1											1								
		UNIT 602				1											1								
		UNIT 701				1											1								
		UNIT 702				1											1								
		UNIT 801				1											1								
		UNIT 802				1											1								
		UNIT 901				1											1								
		UNIT 902				1											1								
		UNIT 1001				1											1								
		UNIT 1002				1											1								
		UNIT 1101				1											1								
		UNIT 1102				1											1								
		UNIT 1201				1											1								
		UNIT 1202				1											1								
		UNIT 1401				1											1								
		UNIT 1402				1											1								
		UNIT 223				1											1								
		UNIT 323				1											1								
		UNIT 423				1											1								
		UNIT 523				1											1								
		UNIT 623				1											1								
		UNIT 723				1											1								
		UNIT 823				1											1								
		UNIT 923				1											1								
		UNIT 1023				1											1								
		UNIT 1123				1											1								
		UNIT 1223				1											1								

Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments		
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V					
		UNIT 1423				1											1									
		UNIT 224				1											1									
		UNIT 324				1											1									
		UNIT 424				1											1									
		UNIT 524				1											1									
		UNIT 624				1											1									
		UNIT 724				1											1									
		UNIT 824				1											1									
		UNIT 924				1											1									
		UNIT 1024				1											1									
		UNIT 1124				1											1									
		UNIT 1224				1											1									
		UNIT 1424				1											1									
		UNIT 604				1												1								
		UNIT 704				1												1								
		UNIT 804				1												1								
		UNIT 904				1												1								
		UNIT 1004				1												1								
		UNIT 1104				1												1								
		UNIT 1204				1												1								
		UNIT 1404				1												1								
		UNIT 214				1												1								
		UNIT 314				1												1								
		UNIT 414				1												1								
		UNIT 514				1												1								
		UNIT 614				1												1								
		UNIT 714				1												1								
		UNIT 814				1												1								
		UNIT 914				1												1								
		UNIT 1014				1												1								
		UNIT 1114				1												1								
		UNIT 1214				1												1								
		UNIT 1414				1												1								
		<b>Totals</b>				<b>68</b>											<b>48</b>	<b>20</b>					<b>97</b>	<b>4</b>		
<b>MO1-22</b>	<b>MO1-220</b>	<b>Lafayette Elderly</b>	<b>1971</b>	<b>26</b>	<b>8</b>	<b>18</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	No	<b>3.8</b>	<b>2</b>	<b>1</b>	<b>0</b>									
		UNIT 106				1											1									
		<b>Totals</b>				<b>1</b>											<b>1</b>	<b>0</b>					<b>16</b>	<b>1</b>		
<b>MO1-23</b>	<b>MO1-230</b>	<b>California Gardens</b>	<b>1971</b>	<b>28</b>	<b>16</b>	<b>12</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	No	<b>3.8</b>	<b>2</b>	<b>0</b>	<b>0</b>									
<b>MO1-26</b>	<b>MO1-260</b>	<b>Page Manor</b>	<b>1982</b>	<b>10</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>6</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>	No	<b>3.8</b>	<b>2</b>	<b>0</b>	<b>0</b>					<b>13</b>	<b>9</b>	2-story townhouses		
<b>MO1-28</b>	<b>MO1-280</b>	<b>Badenhaus Elderly</b>	<b>1974</b>	<b>100</b>	<b>52</b>	<b>48</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	No	<b>3.8</b>	<b>2</b>	<b>8</b>	<b>4</b>									
		<b>8450 GAST PLACE</b>																								
		UNIT 163				1												1								
		UNIT 257				1												1								
		UNIT 261				1												1								
		UNIT 273				1												1								

Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments	
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V				
		UNIT 353				1											1								
		UNIT 357				1											1								
		UNIT 437				1											1								
		UNIT 337			1												1								
		UNIT 175			1												1								
		UNIT 177			1												1								
		UNIT 184			1													1							
		UNIT 186			1													1							
	<b>Totals</b>	<b>Badenhaus Elderly</b>		<b>8</b>	<b>4</b>											<b>8</b>	<b>4</b>					<b>43</b>	<b>14</b>		
<b>MO1-34</b>	<b>MO1-340</b>	<b>LaSalle Park</b>	<b>1976</b>	<b>148</b>	<b>0</b>	<b>0</b>	<b>30</b>	<b>79</b>	<b>39</b>	<b>0</b>	<b>0</b>	<b>0</b>	No	<b>3.8</b>	<b>2</b>	<b>8</b>	<b>3</b>								
		1013 Hickory					1										1								
		1029 Hickory					1										1								
		922 LASALLE					1										1								
		1021 Lasalle					1											1							
		1034 Lasalle					1										1								
		1120 South 11TH							1									1							
		1026 Hickory					1										1								
		1015 Morrison							1								1								
		927 Hickory					1										1								
		923 Hickory							1								1								
		1221 10TH							1									1							
	<b>Totals</b>	<b>LaSalle Park</b>				<b>0</b>	<b>7</b>	<b>2</b>	<b>2</b>							<b>8</b>	<b>3</b>					<b>147</b>	<b>9</b>		
<b>MO1-35</b>	<b>MO1-350</b>	<b>Armand &amp; Ohio</b>	<b>1982</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	Yes, 2004	<b>3.8</b>	<b>2</b>	<b>0</b>	<b>0</b>					<b>4</b>	<b>0</b>		
<b>MO1-37</b>	<b>MO1-370</b>	<b>Cochran Plaza</b>	<b>1982</b>	<b>78</b>	<b>0</b>	<b>0</b>	<b>15</b>	<b>41</b>	<b>12</b>	<b>4</b>	<b>6</b>	<b>0</b>	No	<b>3.8</b>	<b>2</b>	<b>0</b>	<b>0</b>					<b>106</b>	<b>12</b>		
		912 Cass					1										1	1							
		1413 N. 9th					1										1								
		911 Manhattan Place					1										1								
		1416 N. 10th							1								1								
		910 Manhattan Place							1								1								
		909 Ofallon					1										1	1							
	<b>Totals</b>	<b>Cochran Plaza</b>					<b>4</b>	<b>1</b>	<b>1</b>							<b>6</b>	<b>2</b>			<b>0</b>		<b>87</b>	<b>6</b>		
<b>MO1-38</b>	<b>MO1-380</b>	<b>Folsom</b>	<b>1983</b>	<b>6</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	No	<b>3.8</b>	<b>2</b>	<b>3</b>	<b>1</b>								2-story townhouses
		3919 Folsom #. 1A							1								1								
		3919 Folsom #. 1B					1										1								
		3919 Folsom #. 1E							1								1								
		3919 Folsom #. 2F							1									1							
	<b>Totals</b>	<b>Folsom</b>					<b>1</b>	<b>2</b>	<b>1</b>							<b>3</b>	<b>1</b>					<b>5</b>	<b>1</b>		
<b>MO1-38</b>	<b>MO1-381</b>	<b>Samuel Shepard</b>	<b>1982</b>	<b>16</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>4</b>	<b>8</b>	<b>0</b>	<b>0</b>	<b>0</b>	No	<b>3.8</b>	<b>2</b>	<b>4</b>	<b>2</b>								
		2906 Samuel Shepard Unit. 1B							1								1								
		2906 Samuel Shepard Unit. 1E						1									1								
		2926 Samuel Shepard Unit. 1B							1								1								
		2926 Samuel Shepard Unit. 1F							1								1								

Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments	
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V				
		2906 Samuel Shepard Unit. 1A							1								1								
		2926 Samuel Shepard Unit. 1A							1								1								
		<b>Totals Samuel Shepard</b>					1	2	3								4	2					14	3	
MO1-38	MO1-382	<b>Marie Fanger</b>	1984	6	0	0	2	2	2	0	0	0	No	3.8	2	0	2								
		4377 Norfolk # 1A							1								1								
		4377 Norfolk # 1E							1								1								
		<b>Totals Marie Fanger</b>					1	1									0	2					5	2	
MO1-38	MO1-383	<b>Cupples</b>	1984	4	0	0	0	2	2	0	0	0	No	3.8	2	1	1								
		4704 Cupples # 1A							1								1								
		4704 Cupples # 2D							1								1								
		<b>Totals Cupples</b>						1	1								1	1					4	2	
MO1-38	MO1-384	<b>Hodiamont</b>	1982	22	0	0	4	8	10	0	0	0	No	3.8	2	4	4								
		2521 Hodiamont # 1A							1								1								
		2521 Hodiamont # 1E							1								1								
		2521 Hodiamont # 2F							1									1							
		1949 Hodiamont # 1B							1								1								
		1949 Hodiamont # 2C							1									1							
		1949 Hodiamont # 2G							1									1							
		2505 Hodiamont # 2D							1									1							
		2505 Hodiamont # 1B							1								1								
		<b>Totals Hodiamont</b>						6	2								4	4					15	4	
MO1-39	MO1-390	<b>Badenfest Elderly</b>	1983	21	0	18	3	0	0	0	0	0	No	3.8	2	2	0								
		<b>8220 N. Broadway</b>																							
		UNIT 201							1								1								
		UNIT 204					1										1								
		<b>Totals Badenfest Elderly</b>					1	1									2	0					5	2	
MO1-41	MO1-410	<b>South Broadway</b>	1984	10	0	0	0	10	0	0	0	0	No	3.8	2	0	0								2-story townhouses
MO1-41	MO1-411	<b>Walnut Park</b>	1982	13	0	0	0	8	1	4	0	0	No	3.8	2	3	1								
		5519 Plover								1							1								
		5228 Gilmore							1								1								
		6030 Gareche							1								1								
		5205 Gilmore							1									1							
		<b>Totals Walnut Park</b>						3		1							3	1					13	4	
MO1-41	MO1-412	<b>Lookaway</b>	1982	17	0	0	0	7	10	0	0	0	No	3.8	2	0	0								2-story townhouses
MO1-42	MO1-420	<b>Lafayette Townhomes</b>	1985	38	0	18	16	4	0	0	0	0	No	3.8	2	0	0								2-story townhouses
MO1-42	MO1-421	<b>Tiffany Turnkey</b>	1982	25	0	19	6	0	0	0	0	0	No	3.8	2	0	0								2-story townhouses
MO1-44	MO1-440	<b>Murphy Park I</b>	1997	93	0	0	39	42	8	3	1		No	3.8	2	3	0								
		1429 N. 19th St. # 101							1								1								
		1429 N. 19th St. #102							1								1								
		1931 Phipps #102							1								1								
		<b>Totals Murphy Park I</b>					3	0									3	0							
MO1-45	MO1-450	<b>Murphy Park II</b>	2000	64	0	0	27	30	7	0	0	0	No	3.8	2	8	0								
		2033 Howard St.							1								1								

Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments	
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V				
		2035 Howard St.					1										1								
		2115 Howard St.						1									1								
		1018 N. 19th St.						1									1								
		1022 N. 19th St.							1								1								
		1017 N. 18th St.						1									1								
		1021 N. 18th St.							1								1								
		1005 N. 18th St.							1								1								
		<b>Totals</b>						<b>3</b>	<b>5</b>								<b>8</b>	<b>0</b>							
<b>MO1-46</b>	<b>MO1-460</b>	<b>Murphy Park III</b>	<b>-</b>	<b>65</b>	<b>0</b>	<b>0</b>	<b>25</b>	<b>30</b>	<b>5</b>	<b>4</b>	<b>1</b>	<b>0</b>	<b>No</b>	<b>3.8</b>	<b>2</b>	<b>7</b>	<b>0</b>								
		1860B Mullanphy					1										1								
		2012B Mullanphy							1								1								
		2100A Mullanphy							1								1								
		2100C Mullanphy					1										1								
		2017A Mullanphy					1										1								
		2017B Mullanphy					1										1								
		2017C Mullanphy					1										1								
		<b>Totals</b>					<b>5</b>	<b>1</b>	<b>1</b>								<b>7</b>	<b>0</b>							
<b>MO1-47</b>	<b>MO1-470</b>	<b>King Louis Square</b>	<b>2002</b>	<b>36</b>	<b>0</b>	<b>8</b>	<b>22</b>	<b>4</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>No</b>	<b>3.8</b>	<b>2</b>	<b>3</b>	<b>0</b>								
		1620 S. 14th Street					1										1								
		1621 S. Tucker					1										1								
		1620 S. Tucker					1										1								
		<b>Totals</b>					<b>2</b>	<b>1</b>									<b>3</b>	<b>0</b>							
<b>MO1-48</b>	<b>MO1-480</b>	<b>Les Chateau</b>	<b>2003</b>	<b>40</b>	<b>0</b>	<b>30</b>	<b>10</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>No</b>	<b>3.8</b>	<b>2</b>	<b>6</b>	<b>2</b>								
		<b>1020 S. 14th Street</b>																							
		UNIT 108					1										1								
		UNIT 114						1										1							
		UNIT 107					1										1								
		UNIT 109					1										1								
		UNIT 110					1										1								
		UNIT 210						1									1								
		UNIT 214					1										1								
		UNIT 310					1										1								
		<b>Totals</b>					<b>6</b>	<b>2</b>									<b>6</b>	<b>2</b>							
<b>MO1-49</b>	<b>MO1-490</b>	<b>King Louis Square II</b>	<b>2004</b>	<b>44</b>	<b>0</b>	<b>10</b>	<b>21</b>	<b>13</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>No</b>	<b>3.8</b>	<b>2</b>	<b>1</b>	<b>0</b>								
		1437 Park						1									1								
		<b>Totals</b>						<b>1</b>									<b>1</b>	<b>0</b>							
<b>MO1-50</b>	<b>MO1-500</b>	<b>Renaissance at Grand</b>	<b>2005</b>	<b>62</b>	<b>0</b>	<b>3</b>	<b>32</b>	<b>15</b>	<b>10</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>No</b>	<b>3.8</b>	<b>2</b>	<b>3</b>	<b>2</b>								
		3435 A Delmar						1									1								
		3435 B Delmar							1								1								
		3332 A Bell					1										1								
		3305 A Franklin					1											1							
		3414 B Bell						1									1								
		<b>Totals</b>					<b>2</b>	<b>1</b>	<b>1</b>	<b>1</b>							<b>3</b>	<b>2</b>					<b>223</b>	<b>16</b>	
<b>MO1-51</b>	<b>MO1-510</b>	<b>McMillan Manor II</b>	<b>2004/08</b>	<b>18</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>14</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>No</b>	<b>3.8</b>	<b>2</b>	<b>1</b>	<b>1</b>								
		4569 McMillan						1									1								



Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments	
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V				
		4567 McMillan						1									1								
	<b>Totals</b>	<b>McMillan Manor II</b>						<b>2</b>									<b>1</b>	<b>1</b>					<b>34</b>	<b>1</b>	
<b>MO1-52</b>	<b>MO1-520</b>	<b>King Louis Square III</b>	<b>2006</b>	<b>24</b>	<b>0</b>	<b>8</b>	<b>0</b>	<b>12</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>	No	<b>3.8</b>	<b>2</b>	<b>3</b>	<b>0</b>								
		1116 14th Street				1											1								
		1324 Lasalle				1											1								
		1101 13th St.							1								1								
	<b>Totals</b>	<b>King Louis Square III</b>				<b>2</b>			<b>1</b>								<b>3</b>	<b>0</b>							
<b>MO1-54</b>	<b>MO1-540</b>	<b>Sen. Living @ Ren. Pl.</b>	<b>2006</b>	<b>75</b>	<b>0</b>	<b>69</b>	<b>6</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	No	<b>3.8</b>	<b>2</b>	<b>5</b>	<b>3</b>								
		3217 MLK																							
		UNIT 103				1											1								
		UNIT 104				1											1								
		UNIT 105				1											1								
		UNIT 106				1											1								
		UNIT 121				1											1								
		UNIT 126				1											1								
		UNIT 129				1											1								
		UNIT 305				1											1								
	<b>Totals</b>	<b>Sen. Living @ Ren. Pl.</b>				<b>8</b>											<b>5</b>	<b>3</b>					<b>73</b>	<b>8</b>	
<b>MO1-55</b>	<b>MO1-550</b>	<b>Gardens @ Ren.</b>	<b>2006</b>	<b>22</b>	<b>0</b>	<b>20</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	No	<b>3.8</b>	<b>2</b>	<b>1</b>	<b>3</b>								
		3117 Thomas																							
		UNIT 102				1											1								
		UNIT 103				1											1								
		UNIT 206					1										1								
		UNIT 305				1											1								
	<b>Totals</b>	<b>Gardens @ Ren.</b>				<b>3</b>	<b>1</b>										<b>1</b>	<b>3</b>					<b>31</b>	<b>2</b>	
<b>MO1-56</b>	<b>MO1-560</b>	<b>Cahill House</b>	<b>2006</b>	<b>80</b>	<b>0</b>	<b>77</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	No	<b>3.8</b>	<b>2</b>	<b>10</b>	<b>2</b>								
		1919 O'Fallon																							
		UNIT 110				1											1								
		UNIT 121				1											1								
		UNIT 130					1										1								
		UNIT 203				1											1								
		UNIT 210				1											1								
		UNIT 216				1											1								
		UNIT 230				1											1								
		UNIT 240					1										1								
		UNIT 303				1											1								
		UNIT 310				1											1								
		UNIT 316				1											1								
		UNIT 330				1											1								
	<b>Totals</b>	<b>Cahill House</b>				<b>10</b>	<b>2</b>										<b>10</b>	<b>2</b>					<b>52</b>	<b>2</b>	
<b>MO1-57</b>	<b>MO1-570</b>	<b>Ren Pl at Grand II</b>	<b>2006</b>	<b>36</b>	<b>0</b>	<b>0</b>	<b>27</b>	<b>7</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	No	<b>3.8</b>	<b>2</b>	<b>3</b>	<b>0</b>								
		822 A Leonard					1										1								
		822 B Leonard							1								1								
		3222 B Bell Ave					1										1								
	<b>Totals</b>	<b>Ren Pl at Grand II</b>				<b>0</b>	<b>1</b>	<b>1</b>	<b>1</b>								<b>3</b>	<b>0</b>					<b>110</b>	<b>6</b>	

Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V			
MO1-58	MO1-580	<b>Cambridge Heights</b>	2007	46	0	9	21	9	5	2	0	0	No	3.8	2	6	2							
		1435 8th St.				1										1								
		816 Dickson St.						1									1							
		1312 8th St.						1									1							
		704 A Dickson St.				1											1							
		1411 B 7th St.					1										1							
		1401 A 7th St.				1											1							
		1314 A 7th St.				1											1							
		1309 B 7th St.					1										1							
	Totals	<b>Cambridge Heights</b>				4	2	2	0							6	2					125	7	
MO1-59	MO1-590	<b>Ren PI at Grand III</b>	2008	50	0	6	11	21	10	2	0	0	No	3.8	2	8	0							
		1101 A N. Compton					1									1								
		3217 A School St.						1									1							
		1100 C N. Leonard					1										1							
		3203 A Renaissance					1										1							
		1201 A N. Leonard							1								1							
		1201 B N. Leonard						1									1							
		1216 A Josephine Baker					1										1							
		1216 C Josephine Baker				1											1							
	Totals	<b>Ren PI at Grand III</b>				1	4	2	1							8	0					153	11	
MO1-60	MO1-600	<b>Cambridge Heights II</b>	2009	44	0	2	15	16	7	4	0	0	No	3.8	2	3	2							
		1311 8th St.						1									1							
		835 Carr St.								1							1							
		1207 A 8th St.					1										1							
		1109 A 8th St.					1										1							
		1109 B 8th St.				1											1							
	Totals	<b>Cambridge Heights II</b>				1	2	1	0	1						3	2					102	9	
MO1-62	MO1-620	<b>Sr. Living at Cambridge</b>	2011	75	0	72	3	0	0	0	0	0	No	3.8	2	3	2							
		<b>728 Biddle</b>																						
		UNIT 101				1											1							
		UNIT 107				1											1							
		UNIT 126					1										1							
		UNIT 201				1											1							
		UNIT 205				1											1							
	Totals	<b>Sr. Living at Cambridge</b>				4	1	0	0							3	2					54	4	
MO1-63	MO1-630	<b>North Sarah</b>	2012	59	0	34	25	0	0	0	0	0	No	5	2	5	2							
		4091 Finney Ave, Unit 106					1										1							
		4075 Finney Ave, Unit A						1									1							
		4075 Finney Ave, Unit B						1									1							
		4059 Finney Ave						1									1							
		4078 CD Banks Ave, Unit A						1									1							
		4078 CD Banks Ave, Unit B						1									1							
		4058 CD Banks Ave					1										1							
	Totals	<b>North Sarah</b>				2	5									5	2					120	8	
MO1-64	MO1-640	<b>Arlington Grove</b>	2012	70	0	47	23	0	0	0	0	0	No	5	2	5	2							

Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments	
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V				
		1627 Burd Ave				1											1								
		1632 Clara Ave				1											1								
		5551 MLK Blvd., Unit 210				1											1								
		1617 Burd Ave, Unit 101				1											1								
		1522 Clara Ave, Unit A						1									1								
		1522 Clara Ave, Unit B						1									1								
		5568 Theodosia						1									1								
	<b>Totals</b>	<b>Arlington Grove</b>				<b>4</b>	<b>3</b>									<b>5</b>	<b>2</b>					<b>122</b>	<b>8</b>		
<b>MO1-65</b>	<b>MO1-650</b>	<b>North Sarah II</b>	<b>2014</b>	<b>46</b>		<b>5</b>	<b>32</b>	<b>25</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	No	<b>2.3</b>	<b>0.92</b>	<b>5</b>	<b>3</b>								
		4145 CD Banks Ave, Unit A						1									1								
		4115 CD BANKS AVE						1									1								
		4132 FINNEY AVE					1										1								
		4110 FINNEY AVE					1										1								
		4105 CD Banks Ave, Unit 101					1										1								
		3903 CD Banks Ave, Unit 110				1											1								
		3903 CD Banks Ave, Unit 203					1										1								
		3902 CD Banks Ave, Unit 203					1										1								
	<b>Totals</b>	<b>North Sarah II</b>				<b>1</b>	<b>5</b>	<b>2</b>								<b>5</b>	<b>3</b>					<b>112</b>	<b>8</b>		
<b>MO1-66</b>	<b>MO1-66</b>	<b>North Sarah III</b>	<b>2017</b>	<b>35</b>		<b>13</b>	<b>43</b>	<b>21</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	No	<b>1.75</b>	<b>0.7</b>	<b>5</b>	<b>3</b>								
		1034 Whittier Street				1											1								
		1050 Whittier Street				1											1								
		1022 Whittier Street					1										1								
		1028 Whittier Street				1											1								
		4158 CD Banks Ave.					1										1								
	<b>Totals</b>					<b>3</b>	<b>2</b>	<b>0</b>								<b>4</b>	<b>1</b>					<b>82</b>	<b>6</b>		
<b>GRAND TOTAL</b>				<b>2790</b>	<b>8</b>	<b>180</b>	<b>54</b>	<b>39</b>	<b>16</b>	<b>3</b>	<b>0</b>	<b>0</b>		<b>8.28%</b>	<b>3.41%</b>	<b>231</b>	<b>95</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2173</b>	<b>189</b>		

## MEMORANDUM

To: Board of Commissioners

Through: Alana C. Green, Executive Director

From: Fran Bruce, Planning and Procurement Manager

Date: June 9, 2022

Subject: Resolution No.  
Approving and Authorizing the Submission of the Agency Plan Annual Submission  
for Fiscal Year 2022

**DRAFT**

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Board approval is requested to authorize the St. Louis Housing Authority to submit the Agency Plan Annual Submission for fiscal year 2022.

The St. Louis Housing Authority has prepared the Agency Plan Annual Plan Submission in accordance with the regulations and requirements of 24 CFR 903.

Resident planning meetings were conducted to encourage meaningful participation in the planning and development process of the annual submission.

The proposed Agency Plan Annual Submission includes the following exhibits for your review:

1. Comments and Response Summary from Public Hearing
  - Comments and Responses to Agency Plan Section B.6
2. Flyers and Minutes from Town Hall Meetings
3. Certification of Compliance
4. Civil Rights Certification

**Approving and Authorizing Submission of the Agency Plan  
Annual Submission for Fiscal Year 2022**

WHEREAS, the St. Louis Housing Authority (SLHA) desires to submit the Agency Plan Annual Submission for fiscal year 2022; and

WHEREAS, the Agency Plan Annual Submission has been prepared in accordance with 24 CFR Part 903 regulations and requirements for submission to HUD; and

WHEREAS, SLHA has worked in collaboration with the St. Louis Tenant Affairs Board and conducted planning meetings to obtain recommendations in the development of the proposed Annual Submission; and

WHEREAS, SLHA has published notices and made the proposed Agency Plan Annual Submission available for inspection and public comment for a period of 45 days prior to the Public Hearing; and

WHEREAS, SLHA has obtained certification from local government officials that the proposed Agency Plan Annual Submission is consistent with the jurisdiction consolidated plan; and

WHEREAS, SLHA conducted a virtual Public Hearing on June 15, 2022, to obtain public comments regarding the proposed Annual Submission; and

WHEREAS, SLHA has considered all comments and recommendations received, and has incorporated all relevant changes in the proposed Agency Plan Annual Submission.

**NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE ST. LOUIS HOUSING AUTHORITY THAT:**

1. The Executive Director of the St. Louis Housing Authority is authorized and directed to submit the Agency Plan Annual Submission for fiscal year 2022 to HUD.

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Sal F. Martinez, Chairman  
Board of Commissioners  
St. Louis Housing Authority

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Alana C. Green, Secretary  
Board of Commissioners  
St. Louis Housing Authority

Approved by the Board of Commissioners on June 23, 2022



## MEMORANDUM

To: Board of Commissioners

Through: Alana C. Green, Executive Director

From: Jason W. Hensley, Director of Real Estate Development

Date: June 9, 2022

Subject: Resolution No. XXXX  
Approving and Authorizing the St. Louis Housing Authority Capital Fund Five-Year Plan and the FFY 2022 Capital Fund Annual Statement

**DRAFT**

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In 2013, HUD published the Capital Fund Final rule, which decoupled the Capital Fund Submissions from the Agency Plan. The rule requires housing authorities to develop a separate Capital Fund submission. Housing authorities are required to hold a public hearing, consult with the resident advisory board (RAB) and submit any comments received from these hearings and the consultations for the Capital Fund submission. HUD guidance suggests that this process be held concurrent with the Agency Plan process.

The St. Louis Housing Authority (SLHA) prepared a revised Capital Fund Five-Year Plan (Plan) in conjunction with the 2022-2026 Agency Five-Year Plan and Annual Plan. SLHA provided a 45-day comment period and conducted a public hearing on June 15, 2022. The Capital Fund Five-Year Plan was available to residents and the St. Louis TAB (the City-Wide RAB) prior to the hearing. The comments to the Capital Fund Five-Year Plan and the responses are attached.

In addition, HUD revised the process for accepting annual Capital Fund grants. The ACC amendments are now deemed executed when the first funds are drawn from the grant. Board approval of individual ACC amendments is no longer required. Additionally, HUD no longer provides Replacement Housing Factor Capital Fund grants. SLHA was notified on May 14, 2021 that its FFY 2021 Capital Fund allocation is \$8,312,009.00. SLHA completed the FFY 2022 Capital Fund Annual Statement in accordance with the latest approved Capital Fund Five-Year Plan.

Board approval of the SLHA Capital Fund Five-Year Plan, FFY 2022 Capital Fund Annual Statement and the definition of a significant amendment or modification to the plan are requested. All supporting documents are attached.

**Authorizing and Approving the St. Louis Housing Authority Capital Fund Five-Year Plan  
and the FFY 2022 Capital Fund Annual Statement**

WHEREAS, the St. Louis Housing Authority (SLHA) has prepared the Capital Fund Five-Year Plan and the FFY 2022 Capital Fund Annual Statement in accordance with 24 CFR § 903.7(g) and the guidance provided by HUD; and

WHEREAS, the SLHA has worked in collaboration with the St. Louis Tenant Affairs Board and conducted planning meetings to obtain comments on the proposed Capital Fund Five-Year Plan and FFY 2022 Capital Fund Annual Statement; and

WHEREAS, the SLHA has published notices and made the proposed Capital Fund Five-Year Plan and FFY 2022 Capital Fund Annual Statement available for inspection and public comment for a period of 45 days prior to the Public Hearing; and

WHEREAS, the SLHA has developed a definition of a significant amendment or modification to the plan regarding the proposed Capital Fund Five-Year Plan; and

WHEREAS, the SLHA conducted a Public Hearing on June 15, 2022 to obtain public comments regarding the proposed Capital Fund Five-Year Plan; and

WHEREAS, the SLHA has considered all comments and recommendations received and has incorporated all relevant changes in the proposed Capital Fund Five-Year Plan.

**NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE ST. LOUIS HOUSING AUTHORITY THAT:**

1. The Executive Director of the St. Louis Housing Authority is authorized and directed to take all actions necessary to obtain HUD approval and implement the Capital Fund Five-Year Plan and the FFY 2022 Capital Fund.