



California Association of Housing Authorities

March 13, 2020

The Honorable Benjamin S. Carson, Sr., M.D.
Secretary
U.S. Department of Housing and Urban Development
451 7th Street, S.W.
Washington, DC 2410-0001

RE: SUPPORT FOR WAIVERS REQUESTED BY PHADA AND NAHRO ON BEHALF OF PHAs

Dear Secretary Carson:

The California Association of Housing Authorities (CAHA), representing a coalition of the 103 Public Housing Authorities in California that administers some 300,000 Section 8 Housing Choice Vouchers (approximately 13% of all vouchers nationwide) and approximately 27,300 Public Housing units, is writing to support the requests submitted by the National Association of Housing and Redevelopment Officials (NAHRO) and the Public Housing Authorities Directors' Association (PHADA) for certain waivers from HUD requirements and regulations in response to COVID-19.

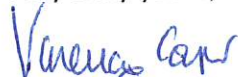
We are in agreement with PHADA and NAHRO that the following activities/requirements/regulations be waived or suspended until further notice, or until further guidance is provided and the Center for Disease Control has determined that normal operations can resume without risk.

- Requirements for HQS and UPCS annual inspections to be completed at least once every 24 months and allow for any pending periodic inspections to be postponed indefinitely. (Initial inspections and some complaint inspections may still be completed based on local conditions and restrictions.)
- Requirements for completing annual and interim recertifications/redeterminations within a specific time frame.
- All scoring – SEMAP and PHAS scoring should not occur for 2020.
- Obligations and requirements relating to regular HUD submissions, including PIC, VMS, EPIC, and any and all electronic reporting mechanisms.
- Public meeting requirements relating to PHA annual plans, etc.
- Extend deadlines for any and all other submissions, including competitive grant applications, grant or other reports, PHA annual plans, etc.
- Management and Occupancy Reviews (MORs) in the multi-family program.

Many tasks completed by housing authorities and their staff members require person to person interactions. We take applications, hold briefings, conduct inspections, and perform maintenance repairs, requiring our employees to meet face-to-face and to enter private dwellings, putting both parties at increased potential risks. The experts are advising we take all steps necessary to create social distancing to reduce risks of the virus spread. We cannot stress enough the urgent need to provide the relief described above so agencies and individuals can focus on the primary task at hand - limiting the further spread of this deadly virus.

We understand the HUD, like all federal agencies, is in the throes of developing guidance and protocols to deal with the virus. We respectfully request that the concerns of housing authorities be included in the critical discussions being held and that the items listed above be waived/suspended as appropriate.

Very truly yours,



Vanessa Cooper
President, CAHA