

Montgomery County Housing Authority
Adopted Waivers and Alternative Requirements
For the PH and HCV-PBV Programs
As of April 10, 2020 – December 31, 2021

1. PH and HCV-1: PHA 5-Year and Annual Plan Submission Dates: Significant Amendment Requirements.
2. PH and HC-2: Family Income and Composition: Delayed Annual Examinations. All annual reexaminations due in CY 2020 must be completed by 12/31/2020, and all annual reexaminations due in CY 2021 must be completed by 12/31/2021.
3. PH and HCV-3: Family Income and Composition: Annual Examination; Income Verification Requirements. HUD is waiving the requirements to use the income hierarchy 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) MCHA will use 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 written record, through email or postal mail or other electronic communications.
4. PHA and HCV-4: Family Income and Composition: Interim Examinations. HUD is waiving the requirements to use the income hierarchy and will allow PHAs to forgo third-party income verification requirements for interim reexaminations, including the use of EIV, if the PHA wishes to conduct the interim recertification rather than delaying the family's interim recertification. MCHA will use self-certification as the highest form of income verification to process interim reexaminations. This may occur over the telephone but must be documented by PHA staff with a written record, through email or postal mail or other electronic communications.
5. PH and HCV-5: Enterprise Income Verification (EIV) Monitoring - HUD is waiving the mandatory EIV monitoring requirements through December 31, 2021.
6. PH and HCV-7: Waiting List: Opening and Closing; Public Notice - Waives public notice requirements for opening and closing the waiting list. MCHA will provide public notice through its website: montgomeryhousing.org through December 31, 2021.
7. PH and HCV-8: Eligibility Determination: Income Verification – Waives third-party income verification requirements for applicants and will allow PHAs to use self-certification as the highest form of income verification at admission. Must review the EIV Income and IVT reports within 90 days.
8. PH and HCV-9: Eligibility Determination: Social Security Number and Citizenship Verification- Waives the requirements to obtain and verify SS number documentation and documentation evidencing eligible noncitizen status before admitting applicants to the HCV and PHA programs.

MCHA will accept self-certification of date of birth and disability status if a higher level of verification is not immediately available. Must be provided within 90 days of admission.

9. HCV – Housing Quality Standards (HQS) Inspections

HQS-1: Initial Inspection-Allows owner certification that there is no life-threatening deficiencies. Must inspect unit by 6/30/22. Does not include a waiver of visual assessment for deteriorated paint.

HQS-2: PBV Pre-Hap Contract Inspections: PHA Acceptance of Completed Units- Allows for owner certification that there are no life-threatening deficiencies. Must inspect unit by 6/30/22.

HQS-3: Initial Inspection: Non-Life-Threatening Deficiencies (NLT) Option- Allows for extension of up to 30 days for owner repairs on non-life-threatening conditions.

HQS-4: HQS Initial Inspection Requirement: Alternative Inspection Option- Allows for commencement of assistance payments based on owner certification there are no life-threatening deficiencies. Where self-certification was used, PHA must inspect the unit no later than 6/30/22.

HQS-5: HQS Inspection Requirement: Biennial Inspections -Allows for delay in biennial inspections. MCHA will require owner certification there are no life-threatening deficiencies. Must conduct all delayed biennial inspections from 2020 as soon as reasonably possible but no later than 12/31/22.

HQS-6: HQS Interim Inspections- Waives the requirement for the PHA to conduct interim inspection and requires alternative method. Allows for repairs to be verified by alternative methods.

HQS-7: PBV Turnover Unit Inspection- Allows PBV turnover units to be filled based on owner certification there are no life-threatening deficiencies. Allows for delayed full HQS inspection NLT than 6/30/22.

HQS-8: PBV HAP Contract: HQS Inspections to Add or Substitute Units-Allows for PBV units to be added or substituted in the HAP contract based on owner certification there are no life-threatening deficiencies. Allows for delayed full HQS inspection NLT 6/30/22.

HQS-9: HQS Quality Control Inspections-through December 31, 2021-Provides for a suspension of the requirement for QC sampling inspections.

HQS10: Housing Quality Standards: Space and Security- Waives the requirement that each dwelling unit have at least 1 bedroom or living/sleeping room for each 2 persons. Remains in effect one year from lease term or date of this notice, whichever is longer.

10. Housing Choice Voucher Program Waivers: General

HCV-1: Administrative Plan- Establishes an alternative requirement that policies may be adopted without board approval until 9/30/212. Any provisions adopted informally must be adopted formally by 12/31/21.

HCV-2: Information When Family is Selected: PHA Oral Briefing- Waives the requirement for an oral briefing. Provides for alternative methods to conduct required voucher briefing.

HCV-3: Term of Voucher: Extensions of Term- Allows PHAs to provide voucher extensions regardless of current PHA policy.

HCV-4: PHA Approval of Assisted Tenancy: When HAP Contract is Executed- Provides for HAP payments for contracts not executed within 60 days. PHA must not pay HAP to owner until HAP contract is executed.

HCV-5: Absence from Unit- Allows for PHA discretion on absences from units longer than 180 days. PHAs must not make HAP payments beyond 12/31/20 for units vacant more than 180 consecutive days.

HCV-6: Automatic Termination of HAP Contract- Allows PHA to extend the period of time after the last HAP payment is made before the HAP contract terminates automatically.

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

HCV-8: Utility Allowance Schedule: Required Review and Revision- Provides a delay in updating utility allowance schedule through 12/31/21.

HCV-14: Mandatory Removal of Unit from PBV HAP Contract- Allows a PHA to keep a PBV unit under contract for a period of time that extends beyond 180 days from the last HAP but does not extend beyond December 31, 2020.

HCV-15: PBV and Enhanced Voucher Provisions on Under Occupied Units- 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.