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Richmond Redevelopment and Housing Authority

STATEMENT of ADDITIONAL TEMPORARY WAIVERS and POLICY CHANGES

DURING COVID-19

On March 27, 2020, Congress passed the Coronavirus Aid, Relief, and Economic Security Act (or "CARES Act"). The CARES Act grants the Secretary of the U.S. Department of Housing and Urban Development ("HUD") broad authority to implement waivers to certain housing statutes and regulations during the novel coronavirus (Covid-19) pandemic.

On April 10, 2020, HUD issued Public and Indian Housing Notice 2020-05 (the "Notice"), which describes certain waivers intended to allow public housing authorities to safely continue operations and provide vital housing services during the pandemic. Public housing authorities were authorized to adopt the waivers "immediately" and approval by HUD, or the authority's governing body, was not required.

On July 2, 2020, HUD issued Public and Indian Housing Notice 2020-13 (the "Revision"), which restates the waivers contained in the Notice, describes additional waivers which public housing authorities may adopt, extends the periods of availability for waivers contained in the Notice, and offers technical amendments to several of the same.

This Statement supplements the prior Statements dated April 23, 2020 and April 24, 2020. RRHA will continue observing all the waivers described herein and in these prior Statements until the earlier of (i) a Statement explicitly reverting to regular program requirements or operations, or (ii) the end of the period of availability, as defined by HUD, for any waiver.

This Statement constitutes a description of the additional waivers and other temporary policy changes authorized by the Revision that RRHA will adopt in relation to its Housing Choice Voucher program ("HCVP") and its low-income public housing program ("LIPH") during the Covid-19 pandemic. To the extent that any waiver or temporary policy change conflicts with any provisions or statements contained in RRHA's HCVP Administrative Plan (the "Admin Plan"), RRHA's LIPH Admissions and Continued Occupancy Policy ("ACOP"), or any other existing written RRHA policy (a "Policy" or "Policies"), this Statement also constitutes a temporary addendum to such documents. If any waiver adopted in this Statement contradicts or conflicts with any term of the Admin Plan, ACOP, or other Policy, then the policies described herein will govern for as long as such policy is observed by RRHA, notwithstanding any provision of the Admin Plan, ACOP, or other Policy to the contrary.



Following is a description of each additional waiver or temporary policy change which RRHA will adopt. All references to “Housing Quality Standards” or “HQS” in this Statement shall also be construed to include the phrase “Uniform Physical Condition Standards for Vouchers” or “UPCS-V.” The effective date of each waiver adopted in this Statement shall be construed as the earliest possible effective date permitted by the Notice, the Revision, and by applicable law, unless an alternative effective date is explicitly identified. Further, this Statement shall be construed as RRHA’s election to adopt and observe each waiver or policy change for the maximum time period permitted by the Notice, the Revision, and applicable law, unless another timeframe is explicitly identified herein. If RRHA will adopt an alternative procedure for any HCVP or LIPH requirement waived by the Notice, then the alternative procedure will be described in this Statement. The waivers adopted in this Statement may not be exhaustive and RRHA reserves the right, in accordance with the Notice, the Revision, and applicable law, to revise the scope of these waivers or to adopt additional waivers at any time.

- 1. Waiver HQS-1: Initial UPCS-V Inspections for TBV’s:** RRHA previously adopted Waiver “HQS-1” in part, allowing RRHA to accept, in its discretion, a unit owner’s written certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist in the unit in lieu of the in-person initial inspection. Pursuant to the Notice, RRHA previously advised unit owners that if RRHA accepted such a self-certification, a “make up” inspection on such unit would be conducted no later than October 31, 2020. Pursuant to the Revision, RRHA hereby notifies unit owners that such a “make up” inspection will be conducted as soon as reasonably possible, but not later than one (1) year from the date of the unit owner’s self-certification.
- 2. Waiver HQS-2: Initial UPCS-V Inspections for PBV’s:** RRHA previously adopted Waiver “HQS-2” in part, allowing RRHA to accept, in its discretion, a unit owner’s written certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist in the unit in lieu of the in-person initial inspection. Pursuant to the Notice, RRHA previously advised unit owners that if RRHA accepted such a self-certification, a “make up” inspection on such unit would be conducted no later than October 31, 2020. Pursuant to the Revision, RRHA hereby notifies unit owners that such a “make up” inspection will be conducted as soon as reasonably possible, but not later than one (1) year from the date of the unit owner’s self-certification.
- 3. Waiver HQS-4: UPCS-V Initial Inspection Requirement: Alternative Inspection Option:** RRHA previously adopted Waiver “HQS-4” in part, allowing RRHA to accept, in its discretion, a unit owner’s written certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist in the unit in lieu of the in-person initial inspection. Pursuant to the Notice, RRHA previously advised unit owners that if RRHA accepted such a self-certification, a “make-up” inspection on such unit would be conducted no later than October 31, 2020. Pursuant to the Revision, RRHA hereby notifies unit owners that such a “make up” inspection will be conducted as soon as reasonably possible, but not later than one (1) year from the date of the unit owner’s self-certification.



4. **Waiver HQS-5: UPCS-V Inspection Requirement: Biennial Inspections:** RRHA previously adopted Waiver “HQS-5” and deferred all biennial UPCS-V inspections at all HCVP-assisted units which are scheduled while this waiver is in effect. Pursuant to the Notice, RRHA previously advised unit owners that if a biennial inspection is deferred, a “make up” inspection on such unit would be conducted no later than October 31, 2020. Pursuant to the Revision, RRHA hereby notifies unit owners that such a “make up” inspection will be conducted as soon as reasonably possible, but not later than one (1) year from the date the biennial inspection would have been required absent this waiver.
5. **Waiver HQS-7: PBV Turnover Unit Inspections:** RRHA previously adopted Waiver “HQS-7” in part, allowing RRHA to accept, in its discretion, a unit owner’s written certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist in the unit in lieu of the in-person turnover inspection. Pursuant to the Notice, RRHA previously advised unit owners that if RRHA accepted such a self-certification, a “make-up” inspection on such unit would be conducted no later than October 31, 2020. Pursuant to the Revision, RRHA hereby notifies unit owners that such a “make up” inspection will be conducted as soon as reasonably possible, but not later than one (1) year from the date of the unit owner’s self-certification.
6. **Waiver HQS-8: PBV HAP Contract: UPCS-V Inspections to Add or Substitute Units:** RRHA previously adopted Waiver “HQS-8” in part, allowing RRHA to accept, in its discretion, a unit owner’s written certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist in the unit in lieu of the in-person inspection required prior to the unit being added to a HAP contract or substituted for another unit already subject to the HAP contract. Pursuant to the Notice, RRHA previously advised unit owners that if RRHA accepted such a self-certification, a “make-up” inspection on such unit would be conducted no later than October 31, 2020. Pursuant to the Revision, RRHA hereby notifies unit owners that such a “make up” inspection will be conducted as soon as reasonably possible, but not later than one (1) year from the date of the unit owner’s self-certification.
7. **Waiver HCV-13: Homeownership: Maximum Term of Assistance:** RRHA adopts Waiver “HCV-13”. For as long as this waiver is in effect, RRHA may provide an additional One (1) year of homeownership assistance. All participants in RRHA’s HCV Homeownership program are advised that this additional assistance may be available to them if (a) they are in the last year of the assistance term as defined in 24 C.F.R. § 982.634, and (b) they are experiencing financial hardship as a result of the COVID-19 pandemic.
8. **Waiver HCV-14: Mandatory Removal of Unit from PBV HAP Contract:** RRHA adopts Waiver “HCV-14”. Until December 31, 2020, RRHA will not remove a unit from any of its PBV HAP contracts if there are no housing assistance payments to the unit owner for 180 days or more. Additionally, unit owners and occupants are advised that, during the period of availability for this waiver, RRHA may resume making housing assistance payments on behalf of a family residing in such a unit should the family’s income change at any point.



9. **Waiver PH-12: Public Housing agency Annual Self-Inspections:** RRHA adopts Waiver “PH-12”. Until December 31, 2020, RRHA may not perform annual self-inspections of some or all of its public housing units. Residents are hereby advised that any unit which is not inspected during calendar year 2020 will receive its next inspection on its first regularly scheduled inspection date immediately after this waiver’s period of applicability ends.
10. **Waiver 11(c): Uniform Financial Reporting Standards: Filing of Financial Reports; Reporting Compliance Dates:** RRHA adopts Waiver “11(c)”. In accordance with this waiver, RRHA’s previous June 30, 2020 deadline to submit audited financial information in accordance with 24 C.F.R. § 5.801(b) and (d) is hereby extended to December 31, 2020.

Stacey Daniels-Fayson

Stacey Daniels-Fayson
Interim Chief Executive Officer, RRHA

9-15-2020

Date

