



**Public Housing Authorities
Directors Association**

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March 13, 2020

Dr. Benjamin S. Carson, Sr.
Secretary
U.S. Department of Housing and Urban Development
451 Seventh Street, SW
Washington, DC 20410-0500

Dear Mr. Secretary:

As our country faces the growing pandemic and threats resulting from the Coronavirus and the associated COVID-19 disease, PHADA is requesting broad and immediate support and regulatory relief so public housing authorities and the owners of HUD-assisted housing can take appropriate steps to stop or slow the spread of the virus and protect the individuals and families we serve, our staff and our communities.

PHADA urges you to take any and all necessary steps to waive or suspend all rules and regulations that require actions by PHAs and/or their residents to engage in one on one personal interactions, or to complete steps and tasks that cannot be effectively completed because of the adoption of recommended social distancing practices. We make the following recommendations because they will better enable PHAs to provide needed relief to their residents and voucher holders. For example, in my agency's response plan, the housing authority will not enforce the lease provisions if staff are unable to receive and record their rent payments. Also, we will ask landlords not to pursue evictions in cases where we are unable to make the HAP payment due to lack of funding or staffing issues. Many other PHAs around the country are contemplating similar steps.

Specifically, we are urging you to **immediately waive or suspend the following activities/requirements/regulations until further notice**, or until further guidance is provided and the Centers For Disease Control or other appropriate entity has determined that normal operations can resume without risk.

1. All REAC physical inspections, including NSPIRE sample inspections.
2. Requirements for HQS and UPCS annual inspections to be completed at least once every 12 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).
3. Requirements for completing annual and interim recertifications/redeterminations within a specific time frame.

4. All scoring – SEMAP and PHAS scoring should not occur for 2020.
5. Management and Occupancy Reviews (MORs) in the multi-family program.
6. Public Meeting Requirements relating to Annual Plans, etc.
7. Obligations and requirements relating to regular HUD submissions, including PIC, VMS, EPIC, and any and all electronic reporting mechanisms.
8. Extend deadlines for any and all other submissions, including competitive grant applications, grant or other reports, annual plans, etc.

Responding to the Coronavirus pandemic is challenging, and every state and locality is preparing and responding to the best of their ability. Resources, options, and capacity vary widely across the country, and we urge these waivers to allow local agencies the greatest flexibility in responding to the situation to protect the health and welfare of residents, staff, and the community without facing penalty for lack of compliance. None of us should be putting people at risk to comply with a rule or requirement that does not anticipate our current situation.

Many of our members will be able to maintain some operations with staff working remotely and may have already implemented on-line rent payments. Others may still collect rents directly from tenants and may require in person interviews for recertifications, and staff may not have computers or access to broadband or internet from their homes, preventing remote work. Others still may have unionized work forces that insist on certain workplace changes or reject remote work options. Each agency and locality is different, and HAs need the flexibility to respond as needed to their local conditions without the fear of negative consequence resulting from rules, regulations, policies, and procedures that are no longer appropriate given the quickly evolving situation.

Many tasks completed by housing authorities and their staff members require person to person interaction, and inspections require employees 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.**

In addition to this urgent regulatory relief, PHADA is requesting funding relief be provided to agencies that may face increased costs as a result of emergency measures they must take. At a minimum, we are requesting that Public Housing Operating Funds be distributed quarterly, rather than monthly. This will provide housing authorities with cash that may be needed for urgent up front costs, such as the purchase of additional sanitizing cleaners, staff time to complete disinfection of some facilities, or efforts to ensure seniors or children who may be cut off from school lunch or congregate meal programs can continue to access these essential food resources.

PHADA is developing a mechanism for members to share their response plans for this outbreak as a resource for other agencies and are providing whatever additional support we can for our members. Enacting these suspensions and waivers will do much more to support HAs in responding to this threat than anything PHADA can provide. **We urge you to take any and all steps necessary to enact these changes as soon as possible**, including requesting congressional or executive action as needed.

We are willing and able to discuss any or all of these items at your convenience. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "John Hodge". The signature is written in a cursive style with a long horizontal stroke extending to the right.

John Hodge
PHADA President