



April 23, 2020

To: HAE Property Owners, Participants and Community Stakeholders

Re: Continuing Operations Plan

Dear Valued Partner,

As a result of the COVID-19 pandemic and subsequent stay at home orders from the Governor of the State of Illinois, the Housing Authority of Elgin has restricted many of its processes in order to accommodate the continued safety of the staff and community. This situation presents a challenge for the fundamental delivery of services that meets the requirements of safety, decency, and sanitary living conditions for HAE participants. Additionally, suspension of routine processes presents an acute impediment that ordinarily allow HAE to address changes household income or composition. In order to revive several critical functions of HAE, such as wait list processing, review of Request for Tenancy Approvals, income adjustments for families who have experience an impairment to employment, etc., while also continuing to provide an environment that promotes safety and health, I have elected to implement the following waivers effective April 27, 2020:

#### Income Verifications

PIH Notice 2018-18 prescribes the following order of income verification listed from highest to lowest priority:

1. Upfront Income Verification—Enterprise Income Verification System
2. Upfront Income Verification—Non-HUD databases
3. Written Third Party Verification
4. Written Third Party Verification Form
5. Oral Third-Party Verification
6. Tenant Declaration

HAE will forgo the income verification hierarchy. While written third-party verifications are preferred, it is understandable that these means of variation may prove to be too cumbersome or not at all possible during this time. As such, tenant declarations will be acceptable as a manner of primary income verification. Participant declarations can be obtaining via telephone or in writing. Mandatory file notes must be entered in such circumstances. Any material discrepancy that may come up at a later date due to rent calculations **must** be addressed.

Applicable Time Frame: Ends after December 31, 2020



### Annual Reexaminations

HAE will continue to process annual reexams on a timely basis. Reexams will continue to be processed through the mail. Notifications will be provided to residents no less than 60 days prior to the reexam date and the reexam will be processed no later than 30 days prior to the reexam date in order to provide a thirty-day notice of a rent increase if applicable. As such, no changes will be made to provisions for rental increase request and subsequent rent reasonableness requirements, nor changes in the payment standards at the time of the reexamination when applicable. Any material discrepancy that may come up at a later date due to rent calculations **must** be addressed.

Applicable time frame: Perpetual

### Request for Tenancy Approvals

Effective Monday, April 27, 2020 EHA will resume processing RFTAs.

Applicable time frame: Perpetual

### Briefings

Briefings will be conducted via webcasts, conference calls, and/or expanded information packets. Vouchers will be mailed to participants. Written third party verification and/or verification form will be the preferred method of income verification. Vouchers will be provided for 120-day increments.

Applicable time frame: Ends after July 31, 2020

### Interim Examinations

HAE will prioritize decrease interims. In order to better assist families affected by COVID-19, and to accommodate impediments from staffing levels and limited participant contact, HAE will waive certain procedures and processes. EIV reports will not be a requirement in the completion of interim examinations. Additionally, decrease interim examination may be performed up to 30 days retroactively to account for difficulties families may experience in providing documentation or communications of respective changes in income or family composition. HAE will accept written documentation as well as verbal communication as requisite information to enact the change. Any material discrepancy that may come up at a later date due to rent calculations **must** be addressed.

Applicable time frame: Ends on July 31, 2020

### Family Self-Sufficiency

HAE will extend an FSS participant's contract for up to two years for good cause for participants who are unable to meet the goals of the contract or individual service plan due to negative impact(s) of the COVID-19 situation.

Applicable time frame: Ends after December 31, 2020



#### HQS Inspections

**HAE will take steps ensure the safety, decency, and sanitary conditions while also mitigating the health and safety risks imposed on HAE personnel members, families, and participating owners. In order to do so, HAE will adopt flexible policies for the specified time frame that will allow for the realization of the respective aforementioned concerns. HAE retains the right to conduct an HQS inspection on any assisted unit at any time, regardless of whether a waiver is applied or not. The use of any of these waivers 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 HAE from taking action to enforce the owner's obligations. Furthermore, use of any waiver provisions by HAE does not create in any right in any third party, such as the assisted family, to require enforcement of the HQS requirements by HUD or HAE, or to assert any claim against HUD or HAE, for damages, injunction or other relief, for alleged failure to enforce the HQS. All HAP payments will be approved after provisions of each respective waiver have been applied.**

#### Initial Inspections

HAE will conduct initial inspections on unoccupied single-family units, duplexes, town homes, or any other units without indoor shared common areas. For all other units, rather than conducting an inspection HAE will accept owner certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist in the unit or units in question.

In such cases where the HAE has elected to waive the physical inspection, the HQS inspection will occur as soon as reasonably possible, not to exceed October 31, 2020.

Applicable time frame: Ends after October 31, 2020

#### Project-Based Voucher Pre-HAP Contract Inspection

HAE will accept owner certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist rather than conducting inspections.

Applicable time frame: Ends after October 31, 2020

#### Interim HQS inspections

If a reported deficiency is life-threatening, HAE will notify the owner of the reported life-threatening deficiency and the owner must either correct the life-threatening deficiency within 24 hours of the notification or provide documentation that the reported deficiency does not exist. In cases of a reported non-life-threatening deficiency, HAE will 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 notification or any approved extension period.

Applicable time frame: Ends after July 31, 2020

#### Quality Control Inspections

HAE will waive quality control inspections until November 1, 2020.

Applicable time frame: Ends after October 31, 2020



Annual Inspections

Until further notice, HAE will delay annual inspections.

Applicable time frame: All delayed inspections must be completed when reasonable possible, but no later than October 31, 2020.

HQS Space and Security

HAE will waive the requirement that each unit must have 1 bedroom or living/sleeping room for each 2 persons.

Applicable time frame: Throughout the duration of the current lease or one year from the date of this notice, whichever period of time is longer.

Execution of HAP Contract

HAE may not make a payment on a unit until the HAP contract has been executed. All contracts must be executed no more than 120 days from the beginning date of the lease.

Applicable time frame: Ends after July 31, 2020

Zero Subsidy Participants

HAE will extend the Housing Assistance Payment Contract for families with \$0 assistance payment beyond the current regulatory requirement of 180 days. Any extension will not last beyond December 31, 2020.

Applicable time frame: Ends after December 31, 2020

Sincerely,

*M. Armstrong*

Martell Armstrong  
Chief Executive Officer, Housing Authority of Elgin