FORM LETTER TO CONGRESSIONAL REPRESENTATIVES

FOR FUNDING AND WAIVER REQUESTS

March XX, 2020

[ADDRESS]

Dear [SENATOR] [REPRESENTATIVE]:

The coronavirus COVID-19 pandemic represents a serious threat to the short- and long-term well-being of the vulnerable seniors and families in public housing, other HUD-assisted housing and to the public housing authorities that own and manage housing and vouchers for nearly 3.3 million households.

I am writing on behalf of [HOUSING AGENCY] to request your support for emergency funding and longer-term preservation resources for public housing, along with statutory and regulatory relief for the public housing and housing voucher programs to enable housing authorities to properly support and protect the health of their residents and staff, while maintaining their mission of providing safe and affordable housing.

[HOUSING AGENCY] is calling on you to support:

**FUNDING REQUEST**

**$2 billion for the Public Housing Operating Fund due to lost revenue** -The Operating Fund pays for public housing management and operations, making up the difference between operating costs and tenant rents. Since most employment income in public housing is attributed to low-wage workers, it is estimated that approximately $2 billion will be lost in income from residents, resulting in lost revenue to housing authorities.

**$1.5 billion for short term mitigation and operational costs** - Housing authorities are facing operational challenges as the cost of maintaining clean, safe, and infection-free environments will quickly escalate far beyond our normal operating costs. The purchase of biosafety hazmat suits, disposable gloves, masks, and other personal protective equipment has taken on new urgency and requires significant rise in expenditures as these items are not usually budgeted to any appreciable extent by housing authorities.

**$1.5 billion for emergency staffing, communications, retrofits** - Housing authorities require additional funding for emergency staffing needs, particularly with the unanticipated increased cost of overtime and hazard pay, and with maintenance staff whose staff hours may be increased due to efforts to combat the COVID-19 virus in their facilities. We will need to provide housing for residents who have contracted the virus and must be separated from other family members, particularly those who may come in contact with seniors. In addition, once a person who has tested positive for the COVID-19 virus has been cleared, there will be a need to provide a comprehensive industrial cleaning of the unit to ensure the virus does not spread to other households. These are significant unanticipated expenses for cleaning, staffing, and equipment.

**$3.0 billion for voucher renewals** - The loss of rent revenue is estimated at an average of $200 per month per Housing Choice Voucher (HCV), and given the HCV population is frequently low-wage workers who will suffer the loss of employment similar to public housing, it is estimated that rent revenue losses will translate to over $3 billion in six months under the HCV program.

**$500 million for additional administrative fees** - Administrative fees are essential to housing authorities who administer HCVs. Administrative fees provide funding for many HCV functions, including determining eligibility, conducting the lease-up process, processing annual recertifications, performing interim recertifications, and inspections. Interim recertifications are conducted by housing authority staff at the request of a voucher recipient if the recipient's circumstances change and are often requested when there is a change in income. Supplemental administrative fees will be critical for housing authorities experiencing a large increase in interim recertification requests due to job loss or reduced work hours by their residents.

**Voucher assistance to all households with 30% AMI or less** - The COVID-19 crisis, the affordable housing crisis, and the homeless crisis create a perfect storm and highlight the need for the federal government to address housing insecurity in a comprehensive manner. We strongly urge Congress to provide housing assistance, in the form of HCVs, to all households with incomes at 30 percent or less of area median income.

**WAIVER REQUESTS**

As housing authorities will require significant statutory and regulatory waivers, Congress must act now to provide the U.S. Department of Housing and Urban Development (“HUD”) with the necessary flexibility it needs to respond to the COVID-19 pandemic. While we encourage HUD to exercise the full extent of its waiver authority under 24 C.F.R. § 5.110, HUD will also need authorizations from Congress to provide blanket statutory and regulatory waivers to ensure that housing authorities can receive all needed waivers expeditiously. Statutory and regulatory waivers requested of HUD include the following:

**Funding Flexibility.** Housing authorities face significant, unanticipated costs in responding to the COVID-19 pandemic. Congress should allow HUD to temporarily expand the eligible uses of both public housing and voucher funds to allow housing authorities to pay for the extraordinary costs incurred, regardless of whether such costs arise in the public housing or voucher programs.

**Project-Based Vouchers.** As the COVID-19 pandemic spreads, housing authorities may need to relocate residents on a large-scale to provide for cleaning and sanitization of buildings and the quarantining of residents. To facilitate such large-scale relocations and to ensure the uninterrupted provision of housing assistance, Congress should allow housing authorities to immediately project-base vouchers on an as-needed basis by waiving the percentage limitation (program cap), administrative plan, and other requirements that would impede a housing authority’s ability to quickly and efficiently project-base its Section 8 vouchers.

**Inspections.** Until further notice, HUD should suspend all HQS inspections and temporarily allow housing authorities to self-certify that the unit either meets HQS standards or does not have any life-threatening conditions in order to allow households to move into Section 8 units without delay and without the need for additional Administrative Plan amendments or other approvals.

**Reporting and data submission requirements.** Housing authorities are experiencing staff absences, leaving them unable to complete many basic functions. HUD should implement 90-day extensions for all reporting and data collection submissions coming due in March and April 2020, including but not limited to extensions for recertifications, competitive grant applications, and Annual or MTW Plan deadlines.

**Requirements involving leaving home or large events.** Because residents in many communities are required or advised to stay home, HUD should temporarily waive the community service requirement for public housing residents and waive requirements for any public meetings, including for Public Housing Authority (“PHA”) Plan submissions.

**Electronic signatures.** Many agencies have staff working remotely, where they are unable to collect signatures from residents for required paperwork, such as leases and recertifications. HUD should expedite approval and implementation of electronic signatures for these and other file documents requiring resident signatures.

**HUD’s Rental Assistance Demonstration (“RAD”) program and other housing authority affordable housing transactions.** HUD should extend deadlines required for RAD conversions, mixed finance development, subsidy layering reviews, Section 18 demolition and disposition, and other forms of housing authority affordable housing transactions so that housing authorities have adequate time to complete all required submissions.

**HUD rulemaking.** To allow housing authorities to fully participate in the rulemaking process, HUD should extend the comment period for the Affirmatively Furthering Fair Housing notice that ended on March 16 and place a moratorium on publishing any APA rulemaking or PRA information collections unrelated to COVID-19 in the Federal Register.

**Public Housing Assessment System and Section 8 Management Assessment Program Scoring.** HUD should temporarily hold harmless housing authorities on Public Housing Assessment System (“PHAS”) and Section 8 Management Assessment Program (“SEMAP”) scores or allow housing authorities to carry over the prior year’s score.

**Monitoring and reviews.** Due to housing authority staff reductions and staff time spent responding to COVID-19, HUD should suspend routine reviews and monitoring of housing authority programs.

**Moving to Work Annual Plan & Process**. HUD should temporarily waive the public hearing and public comment requirements for amendments to Annual Moving to Work (“MTW”) Plans, as described in the MTW Standard Agreement between MTW agencies and HUD.

[HOUSING AGENCY] thanks you for considering our request on behalf of the low-income residents we serve. We look forward to working with you to help housing authorities obtain the flexibilities and resources that our residents and staff desperately need. Please do not hesitate to contact me with any questions you may have regarding this request.

Sincerely,