

HOME COVID-19 Statutory Suspensions and Waivers

NCHSA HFA Institute
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Today's Session

- CARES Act – HOME not funded
- Statutory Waivers/ Regulatory Suspensions - HOME Response to COVID-19
- HTF - No statutory suspension authority
 - Waivers forthcoming
- Focus today - HOME
 - PJ responsibility
 - Documentation



HOME Suspension and Waiver Authority

- Section 290 of the National Affordable Housing Act of 1990
 - Provides HUD authority to suspend certain HOME Program statutory requirements to address damage in areas declared a major disaster under Title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act)
 - Affordability, income targeting, environment, fair housing, and labor standards are excluded from this authority
- All 50 states and all territories have disaster declarations
- 24 CFR 5.110
 - Provides HUD authority, subject to statutory limitations, to waive regulatory provisions upon a finding of “good cause”



Purpose of Suspensions/Waivers

- Increase HOME funding for administrative costs
- Help sustain CHDO staff capacity
- Maximize availability of funding for COVID-19 response
- Reduce administrative obstacles to providing assistance
- Facilitate social distancing to protect PJ staff and HOME tenants
- Provide relief from deadlines
- Stabilize financial condition of existing HOME rental projects
- Facilitate emergency tenant-based rental assistance (TBRA)



HOME Suspensions and Waivers - Overview

- HUD issued two memos on April 10, 2020
 - *Availability of Waivers and Suspensions of the HOME Program Requirements in Response to COVID-19 Pandemic (General Program Suspensions and Waiver)*
 - *Suspensions and Waivers to Facilitate Use of HOME-Assisted Tenant-Based Rental Assistance (TBRA) for Emergency and Short-term Assistance in Response to COVID-19 Pandemic*
- HUD issued two further memos on December 4, 2020
 - Extended most waivers from December 31, 2020 through September 30, 2021
 - Made various revisions, updates and clarifications
 - Added one new statutory suspension and one new waiver



HOME Suspensions and Waivers - Notification

- PJs must notify their local Field Office and the Office of Affordable Housing Programs in writing via the appropriate notification mailbox established for that purpose
 - OAHP Notification mailbox – HOMECOVID19@hud.gov
 - Field Office Notifications mailboxes – contact field office or find at <https://www.hudexchange.info/programs/home/covid-19/#regulatory-resources>



HOME Suspensions and Waivers – Notifications Received – General Suspensions and Waivers

- 34 States (plus PR and DC) have elected to implement the suspension and waiver authority provided in the April 10, 2020 General Memo
- 11 States have elected to implement the two additional waivers under the December 4, 2020 General Suspensions and Waivers Memo
 - Submit a written request to the HUD Field Office & copy HOMECOVID19@HUD.gov
- PJs can still notify HUD of its intent to utilize suspensions and waivers
 - Waiver period ends September 30, 2021



10% Administration and Planning Cap Section 212(c) of NAHA and 24 CFR 92.207

Suspension: Increases the limit to enable PJs to expend up to 25 percent of HOME allocation and program income. Applies to FY 2019 and FY 2020 HOME allocations.

PJ Responsibility: Program files must document:

- Implementation of waiver
- Fiscal year HOME allocations increase applied
- Maintain records demonstrating compliance with suspension



CHDO Set-Aside Requirement

Section 231 of NAHA and 24 CFR 92.300(a)(1)

Suspension: Reduces requirement to use 15% HOME funds for housing owned, developed or sponsored by CHDOS to 0%.

Set-aside reduced for fiscal years 2017, 2018, 2019 and 2020
HOME allocations

PJ Responsibility: Program files must document:

- Implementation of waiver
- Fiscal years requirement reduced
- Maintain records demonstrating compliance with suspension



Limits/Conditions on CHDO Operating Assistance

Section 212(g) and 234(b) of NAHA; 24 CFR 92.208 and 92.300(e) and (f)

Requirement:

- CHDO operating assistance limited to 5% of HOME allocation
- Limited to greater of 50% of CHDO's operating budget or \$50,000
- CHDO expected to receive CHDO set-aside funds for specific project within 24 months of receiving operating assistance

Suspension:

- PJ may provide up to 10% of allocation as operating assistance
- Limit on how much a CHDO may receive is eliminated
- PJs not required to limit assistance to CHDOs expected to receive set-aside funds for a project within 24 months



Limits/Conditions on CHDO Operating Assistance Section 212(g) and 234(b) of NAHA; 24 CFR 92.208 and 92.300(e) and (f)

Applicability: Fiscal Years 2019 and 2020 allocations for expenses incurred by CHDOs through June 30, 2021

PJ Responsibility:

- Ensure increased operating assistance used by CHDO to maintain organizational capacity during COVID-19
- Program files must document implementation of waiver
- Maintain records demonstrating compliance with suspension



Matching Contribution Requirements 24 CFR 92.218 and 24 CFR 92.222(b)

Waiver: Reduces match requirement by 100 percent for FY 2020 and FY 2021. Reduction applies to funds a PJ expends between October 1, 2019 and September 30, 2021

PJ Responsibility: Program files must document:

- Implementation of waiver
- Which years reduction taken
- Update match log to indicate match reduced because of implementation of waiver
- Maintain records demonstrating compliance with suspension



Maximum Per Unit Subsidy Limit – Section 212(e) of NAHA; 24 CFR 92.250(a); 24 CFR 92.64(a) (Insular Areas)*

Suspension: Maximum Per Unit Subsidy limit suspended:

- For all rental and homeownership projects underway or to which HOME funds are committed on or before September 30, 2021
- For existing rental projects to which HOME funds are being provided for operating reserve contributions under General Suspensions and Waiver Memos

PJ Responsibility: Project records must document:

- Implementation of the suspension
- Eligibility of project for waiver (project underway and funds committed on or before Sept. 30, 2021 and/or Rental project receiving operating reserve contributions under General Suspensions and Waivers Memos)



Citizen Participation/Public Comment

24 CFR 91.105(c)(2) and (k) (Local governments), 24 CFR 91.115(c)(2) and (i) (States), and, 24 CFR 91.235(e) (Insular areas)
24 CFR 91.401 (Consortia)

Waiver: Reduces public comment period from 30 days to 5 days for amendments to FY 2020 and earlier consolidated plan and annual action plan

PJ Responsibility:

- Provide a 5-day public comment period, if amendment constitutes a substantial amendment under jurisdiction's adopted definition
- Program files must document implementation of waiver
- Maintain records demonstrating compliance with suspension



Income Determination

24 CFR 92.203(a)(1) and (2) and 24 CFR 92.64(a)
(Insular Areas) *

Waiver: Permits use of self-certification as specified in 24 CFR 92.203(a)(1)(ii)

- Source documentation does not accurately reflect current income
- Accommodate social distancing – submission of source documentation unduly difficult
- ***New waiver*** to allow self-certification by in-place tenants of HOME rental units due for recertification in 6th year of period of affordability
- Federal Pandemic Unemployment Compensation (FPUC) & Lost Wages Supplements Payment Assistance are excluded from income



Income Determination

24 CFR 92.203(a)(1) and (2) and 24 CFR 92.64(a)
(Insular Areas)*

PJ Responsibility: Project files must document:

- Tenant income determination including:
 - Signed and dated self-certification of tenant's income
 - Include all income received by the applicant, including any unemployment or emergency benefits (FPUC benefit and Lost Wages Supplemental Payment Assistance are excluded from income)
- Conduct on-site rent and income reviews within 120-days after waiver period
- Program files must document implementation of waiver



On-Site Inspections and Reviews of HOME Rental Housing 24 CFR 92.504(d)(1)(ii) and 24 CFR 92.64(a) (Insular Areas)

Waiver: Extends timeframe for PJs to perform periodic inspections and on-site reviews to ensure compliance with property standards & rent/income requirements

PJ Responsibility:

- Physical inspections within 120 days of end of waiver period
- Review documentation made available electronically by owner
- Program files must document implementation of waiver



Initial Inspections and Annual Re-Inspections of HOME TBRA Units 24 CFR 92.504(d)(1)(iii); 24 CFR 92.209(i) and 24 CFR 92.64(a) (Insular Areas)*

Waiver: Eliminates initial and annual HQS inspections of units occupied by HOME TBRA recipients

PJ Responsibility:

- Take reasonable efforts to address tenant reported health and safety issues during the waiver period
- TBRA file must document steps PJ took to minimize risk unit is substandard
 - Written procedures to minimize risk
- Document compliance with lead-based paint requirements of 24 CFR part 35 subpart M (visual inspection required)
- Ensure all housing meets housing quality standards at 24 CFR 982.401 at the conclusion of the waiver period
- Document implementation of waiver in program files



Four-Year Project Completion Deadline 24 CFR 92.205(e)(2) and 24 CFR 92.64(a) (Insular Areas)*

Waiver: Extends 4-year project-completion deadlines that occurred or will occur on or after April 10, 2020 to September 30, 2021. Waiver includes projects with deadlines that received a one-year extension that was in effect on or after April 10, 2020

PJ Responsibility: Program files must document

- Implementation of waiver
- Project file must document eligibility for waiver



Nine-Month Sale Deadline for Homebuyer Units 24 CFR 92.254(a)(3) and 24 CFR 92.64(a) (Insular Areas)

Waiver: Extends 9-month sale deadline to September 30, 2021, thereby suspending HUD enforcement action

PJ Responsibility: Ensure all other requirements satisfied including

- Homebuyer receives housing counseling
- Determination of family eligibility
- Program and project files must document implementation of waiver



Operating Reserves for Troubled HOME Projects 24 CFR 92.210(a) and (b) and 24 CFR 92.64(a) (Insular Areas)*

Waiver: For projects where operating costs > revenue, eliminates requirement to obtain HUD approval/execute MOA before using HOME to recapitalize operating deficit reserves to preserve viability

Applicability:

- HOME projects within POA experiencing operating deficits due to non-payment of rent, and increased operating costs due to COVID. (e.g., cleaning, closure of amenities)
- Assistance provided for period beginning April 1, 2020 and ending September 30, 2021
- Limited to owners who agree to forego:
 - Distributions of residual receipts through waiver period and 6 months thereafter
 - Rights under lease or State or local law to take legal action for non-payment of rents and collection of late fees
 - Adverse credit reporting for nonpayment of rent or fees



Operating Reserves for Troubled HOME Projects 24 CFR 92.210(a) and (b) and 24 CFR 92.64(a) (Insular Areas)*

PJ Responsibility:

- Determine operating deficits not covered by business disruption insurance or other sources
- Determine maximum HOME assistance to be provided
- Require owner to document operating expenses
- Amend HOME written agreement
- Review project records and require repayment for ineligible costs and reserve balance after waiver period
- Repaid funds are program income
- Program files must document implementation of waiver



Timeframe for PJ's Corrective Actions 24 CFR 92.551(b)(1) and 24 CFR 92.64(a) (Insular Areas)

Waiver: Gives HUD discretion to extend response periods beyond 30 days for findings of HOME regulatory noncompliance issued between April 10, 2020 and September 30, 2021

PJ Responsibility:

- Request that HUD extend time period imposed before the date of this memorandum



HOME TBRA Suspensions & Waivers



Overview

- Memos issued April 10, 2020 and extended and revised December 4, 2020 - “April 2020 TBRA Memo, as amended”
 - <https://www.hudexchange.info/programs/home/covid-19/#regulatory-resources>
- Effective April 10, 2020 through September 30, 2021
- Provides emergency TBRA to households experiencing COVID-19-related financial hardship, including
 - Individuals and families seeking immediate housing
 - Households with housing but experiencing financial hardship
 - Existing TBRA households that need additional assistance as a result of financial hardship
- To date, 17 States have used the suspension and waiver authority provided in the April 10, 2020 TBRA Memo, as amended



Consolidated Plan – Market Analysis, Citizen Participation & Certification

Suspension/Waiver:

- Eliminates need to conduct/revise analysis, amend Con Plan
- Eliminates requirement that PJ certify that TBRA is essential element of Con Plan based on local market analysis
- Reduces citizen participation public comment period to 5 days for amendments to Annual Action Plan

Applicability: PJ's current 5-year Con Plan and any Con Plan/Action Plans amended to reprogram HOME funds for TBRA due to COVID pandemic



Consolidated Plan - Market Analysis, Citizen Participation & Certification

PJ Responsibility:

- Amend Annual Action Plan to add or increase HOME funding for TBRA to address COVID-19 housing needs
- Provide a 5-day public comment period, if Action Plan amendment constitutes a substantial amendment under jurisdiction's adopted definition



Tenant Selection & Targeted Assistance

Section 212(a)(3)(A)(ii) of NAHA, 24 CFR 92.209(c) &
24 CFR 9264(a) (Insular Areas)

Suspension: Eliminates need to develop or revise tenant selection criteria to align with established local housing needs identified in the ConPlan prior to providing emergency TBRA

PJ Responsibility: TBRA program files must document:

- Policies and procedures used to select individuals and families assisted including:
 - Written selection criteria used to select households



Rent Reasonableness

24 CFR 92.209(f) and 24 CFR 92.64(a) (Insular Areas)

Waiver: Permits PJ to provide TBRA without requiring assessment of rents charged for comparable unassisted units

PJ Responsibility: TBRA project file must document:

- Executed rental assistance contract between PJ & owner or tenant, or both
 - Term of contract cannot exceed September 30, 2021
 - Contract identifies the unit rent, tenant contribution, if any, and amount of TBRA



Eligible TBRA Costs & Maximum Subsidy*

24 CFR 92.209(a) & (h) and 24 CFR 92.64(a) (Insular Areas)

Waiver:

- Permits payments up to 100% of:
 - Monthly rent & fees, including past-due rent & fees in accordance with lease
 - Security deposit payments
 - Utility costs, including past-due utility costs & costs to restore service
- Eliminates need to establish utility allowance for different unit types/sizes

Applicability:

- Emergency TBRA provided through September 30, 2021
- Past-due rent, fees, utilities due on or after January 27, 2020



Eligible TBRA Costs & Maximum Subsidy*

24 CFR 92.209(a) & (h) and 24 CFR 92.64(a) (Insular Areas)

PJ Responsibility: TBRA project file must document:

- Executed rental assistance contract with owner, tenant, or both, for mutually-agreed upon term, but not to exceed September 30, 2021
 - Contract includes rent, tenant contribution, TBRA payment
 - For past due rent & fees – due on or after January 27, 2020 & in accordance with lease
- Utility bills, paid directly to tenant or utility company, including:
 - Amount paid
 - Payment date
 - For past-due utilities & service restoration – bill due on or after January 2020



Term of Rental Assistance Contract

24 CFR 92.209(e) and 24 CFR 92.64(a) (Insular Areas)

Waiver:

- Eliminates requirement that rental assistance contract must begin on first day of the term of the lease
- Applies to TBRA tenants already housed & under existing lease

PJ Responsibility: TBRA project file must document:

- Rental assistance contract with owner or tenant, or both, for mutually-agreed upon term, but not to exceed September 30, 2021
- Copy of the tenant's executed lease
 - PJ must review to determine lease amount & responsibility for utility payments
 - VAWA lease addendum must be included for all tenants assisted



Tenant Protections – Lease*

24 CFR 92.209(g) and 24 CFR 92.64(a) (Insular Areas)

Waiver:

- Permits assistance to currently housed individuals that may have lease with one or more prohibited provisions
- Tenant MUST have executed lease, but not required to amend to eliminate prohibited provisions

PJ Responsibility: TBRA project file must document:

- Execute rental assistance contract with owner, tenant, or both for mutually-agreed upon term, but not to exceed September 30, 2021
- Copy of the executed lease between owner & tenant
 - Lease must include VAWA lease addendum or otherwise comply with VAWA requirements at 24 CFR 92.359



Housing Quality Standards (HQS)*

24 CFR 92.209(i) and 24 CFR 92.64(a) (Insular Areas)

Waiver:

- Initial HQS inspection not required prior to providing TBRA
- However, if TBRA provided after September 30, 2021, PJ must conduct HQS inspection prior to executing the new rental assistance contract

PJ Responsibility: TBRA project file must document:

- Steps PJ took to minimize risk that unit is substandard
 - PJ must have written program procedures to minimize risk
- Compliance with lead-based paint requirements of 24 CFR part 35 subpart M
 - Must be visual inspection; virtual inspections are prohibited



Annual HQS Inspection*

24 CFR 504(d)(1)(iii), 24 CFR 92.209(i) and 24 CFR 92.64(a) (Insular Areas)

Waiver:

- Eliminates requirement to conduct annual HQS inspection of units occupied by existing TBRA tenants receiving emergency TBRA

PJ Responsibility: TBRA project file must document:

- Steps PJ took to address tenant reported health and safety issues
- If TBRA provided beyond September 30, 2021, conduct HQS inspection prior to executing new rental assistance contract



Income Determinations*

24 CFR 92.203(a)(2) and 24 CFR 92.64(a) (Insular Areas)

Waiver: In lieu of source documentation, PJ may use self-certification to determine income in accordance with 24 CFR 92.203(a)(1)(ii)

- Federal Pandemic Unemployment Compensation (FPUC) & Lost Wages Supplemental Payment Assistance are excluded from income

PJ Responsibility: TBRA project file must document:

- Tenant income determination including:
 - Signed and dated self certification of tenant's income including statement of COVID financial impact on tenant income
- If TBRA provided beyond September 30, 2021, PJ must determine income in accordance with §92.203(a)(2) prior to executing new rental assistance contract



TBRA Toolkit



TBRA Toolkit

The screenshot shows a web browser window with the URL <https://www.hudexchange.info/programs/home/covid-19/#emergency-tbra>. The page header includes the HUD Exchange logo and navigation links for Programs, Resources, Trainings, Program Support, Grantees, and News. A dark teal banner at the top right contains the text "NEED HOUSING ASSISTANCE?", "Email Updates", and "Log In".

HOME COVID-19 Guidance

This page contains COVID-19 guidance and resources for the HOME Program.

[Regulatory Resources](#)

[FAQs](#)

[Emergency TBRA](#)

[Income Determination](#)

[Landlords and Tenants](#)

Emergency HOME TBRA Toolkit

On December 4, 2020 HUD issued [CPD Memo: Revision and Extension of April 2020 Memo - Suspensions and Waivers to Facilitate Use of HOME-Assisted TBRA for Emergency and Short-term Assistance in Response to COVID-19 Pandemic](#).

To facilitate implementation of emergency TBRA programs, HUD has published the Emergency HOME TBRA Toolkit which collects and organizes all guidance and training resources developed for PJs, covering the following topics:

- Regulatory Resources
- Program Planning and Design
- Program Administration
- Project Management

[Access the Emergency HOME TBRA Toolkit](#)

TBRA Toolkit

Emergency HOME TBRA Toolkit - x +

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Resources and assistance to support HUD's community partners

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HUD EXCHANGE Programs Resources Trainings Program Support Grantees News 🔍

Emergency HOME TBRA Toolkit

This page contains guidance and resources for HOME Participating Jurisdictions (PJs) implementing emergency Tenant-Based Rental Assistance (TBRA) programs in response to the COVID-19 pandemic. General guidance and resources on TBRA can be found on the [HOME Tenant-Based Rental Assistance](#) topics page.

Visit the [HOME COVID-19 Guidance](#) page for additional information and resources related to COVID-19 response for the HOME Program.

Regulatory Resources

[Program Planning and Design](#)

[Program Administration](#)

[Project Management](#)

Regulatory Resources

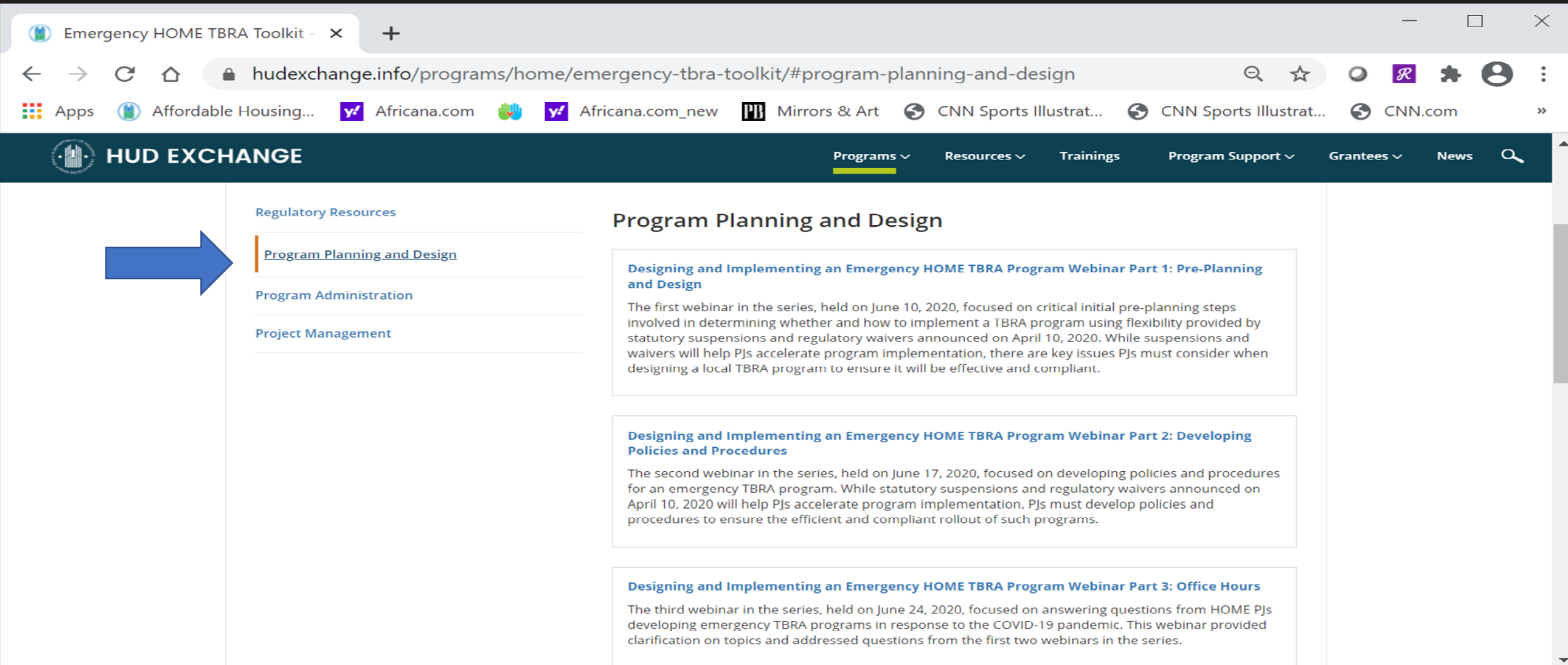
[CPD Memo: Revision and Extension of April 2020 Memo - Suspensions and Waivers to Facilitate Use of HOME-Assisted TBRA for Emergency and Short-term Assistance in Response to COVID-19 Pandemic](#)

The April 2020 TBRA Memo announced the availability of certain statutory suspensions and regulatory waivers to enable HOME PJs affected by the COVID-19 pandemic to use HOME TBRA to facilitate urgent housing assistance to communities and families experiencing financial hardship.

This memorandum, issued on December 4, 2020, extends all statutory suspensions and regulatory waivers outlined in the April 2020 TBRA Memo through September 30, 2021 (the "extended waiver period"), and revises or clarifies several waivers.

Related Webinars

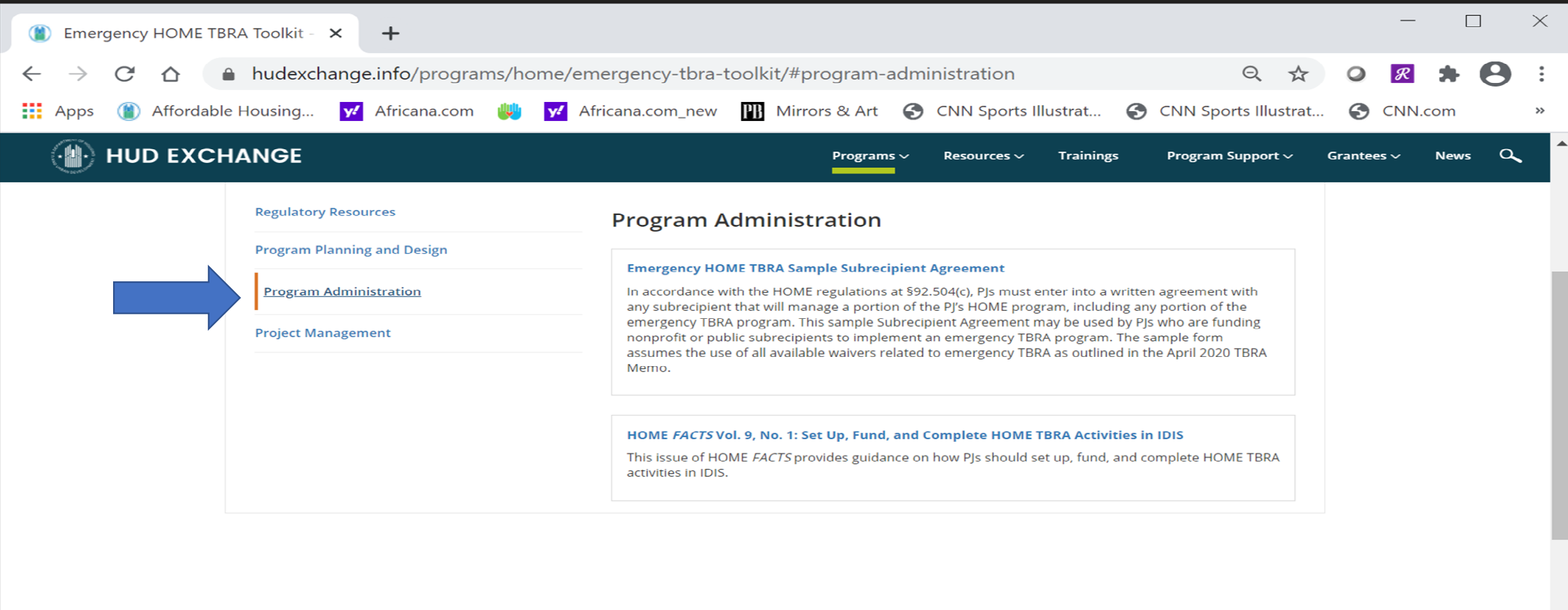
TBRA Toolkit



The screenshot shows a web browser window with the URL hudexchange.info/programs/home/emergency-tbra-toolkit/#program-planning-and-design. The page is titled "Program Planning and Design" and features a sidebar with navigation links: "Regulatory Resources", "Program Planning and Design" (highlighted with a blue arrow), "Program Administration", and "Project Management". The main content area contains three webinar descriptions:

- Designing and Implementing an Emergency HOME TBRA Program Webinar Part 1: Pre-Planning and Design**
The first webinar in the series, held on June 10, 2020, focused on critical initial pre-planning steps involved in determining whether and how to implement a TBRA program using flexibility provided by statutory suspensions and regulatory waivers announced on April 10, 2020. While suspensions and waivers will help PJs accelerate program implementation, there are key issues PJs must consider when designing a local TBRA program to ensure it will be effective and compliant.
- Designing and Implementing an Emergency HOME TBRA Program Webinar Part 2: Developing Policies and Procedures**
The second webinar in the series, held on June 17, 2020, focused on developing policies and procedures for an emergency TBRA program. While statutory suspensions and regulatory waivers announced on April 10, 2020 will help PJs accelerate program implementation, PJs must develop policies and procedures to ensure the efficient and compliant rollout of such programs.
- Designing and Implementing an Emergency HOME TBRA Program Webinar Part 3: Office Hours**
The third webinar in the series, held on June 24, 2020, focused on answering questions from HOME PJs developing emergency TBRA programs in response to the COVID-19 pandemic. This webinar provided clarification on topics and addressed questions from the first two webinars in the series.

TBRA Toolkit



The screenshot shows a web browser window with the URL hudexchange.info/programs/home/emergency-tbra-toolkit/#program-administration. The page is titled "HUD EXCHANGE" and features a navigation menu with "Programs" selected. The main content area is titled "Program Administration" and contains two articles:

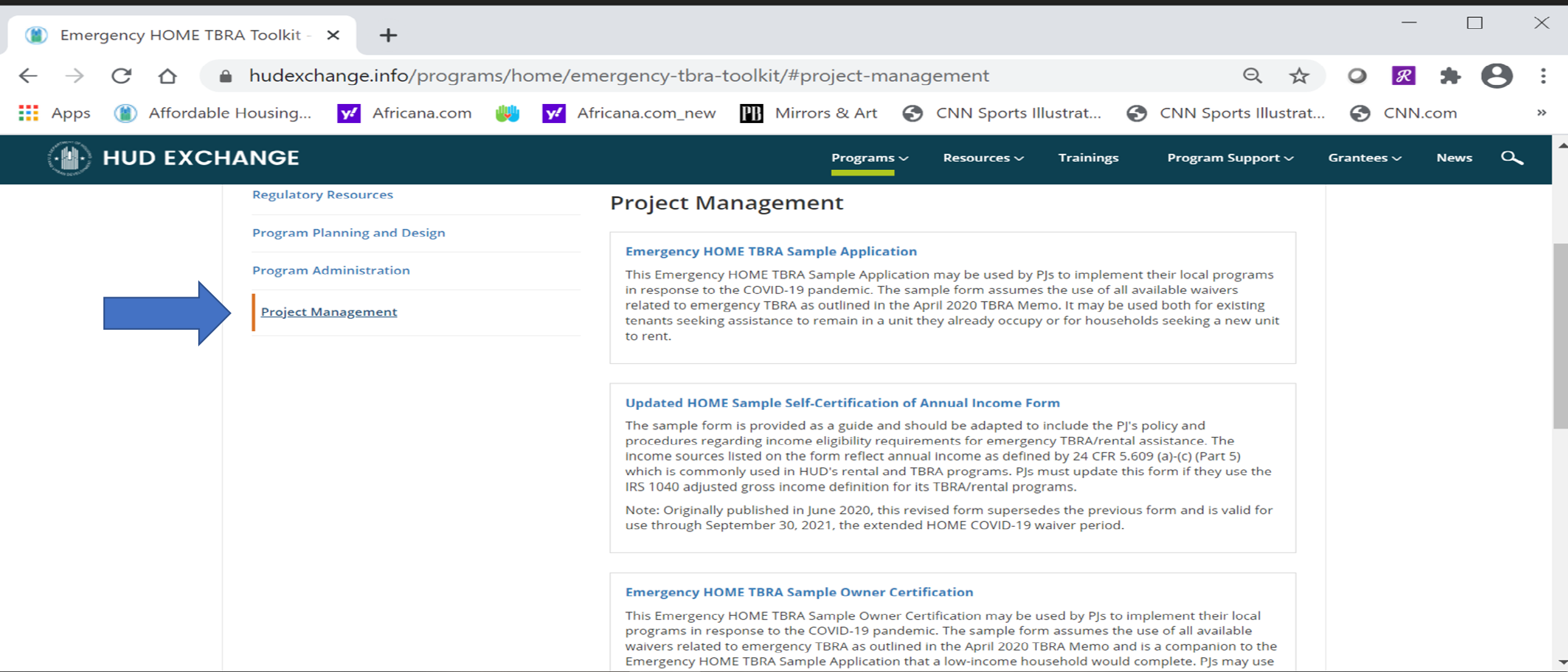
- Emergency HOME TBRA Sample Subrecipient Agreement**

In accordance with the HOME regulations at §92.504(c), PJs must enter into a written agreement with any subrecipient that will manage a portion of the PJ's HOME program, including any portion of the emergency TBRA program. This sample Subrecipient Agreement may be used by PJs who are funding nonprofit or public subrecipients to implement an emergency TBRA program. The sample form assumes the use of all available waivers related to emergency TBRA as outlined in the April 2020 TBRA Memo.
- HOME FACTS Vol. 9, No. 1: Set Up, Fund, and Complete HOME TBRA Activities in IDIS**

This issue of HOME FACTS provides guidance on how PJs should set up, fund, and complete HOME TBRA activities in IDIS.

A blue arrow points to the "Program Administration" link in the left sidebar, which is highlighted with an orange bar.

TBRA Toolkit



The screenshot shows a web browser window displaying the HUD Exchange website. The browser's address bar shows the URL: hudexchange.info/programs/home/emergency-tbra-toolkit/#project-management. The website header includes the HUD Exchange logo and navigation menus for Programs, Resources, Trainings, Program Support, Grantees, and News. The left sidebar contains a list of menu items: Regulatory Resources, Program Planning and Design, Program Administration, and Project Management. A blue arrow points to the 'Project Management' link. The main content area is titled 'Project Management' and contains three sections:

- Emergency HOME TBRA Sample Application**

This Emergency HOME TBRA Sample Application may be used by PJs to implement their local programs in response to the COVID-19 pandemic. The sample form assumes the use of all available waivers related to emergency TBRA as outlined in the April 2020 TBRA Memo. It may be used both for existing tenants seeking assistance to remain in a unit they already occupy or for households seeking a new unit to rent.
- Updated HOME Sample Self-Certification of Annual Income Form**

The sample form is provided as a guide and should be adapted to include the PJ's policy and procedures regarding income eligibility requirements for emergency TBRA/rental assistance. The income sources listed on the form reflect annual income as defined by 24 CFR 5.609 (a)-(c) (Part 5) which is commonly used in HUD's rental and TBRA programs. PJs must update this form if they use the IRS 1040 adjusted gross income definition for its TBRA/rental programs.

Note: Originally published in June 2020, this revised form supersedes the previous form and is valid for use through September 30, 2021, the extended HOME COVID-19 waiver period.
- Emergency HOME TBRA Sample Owner Certification**

This Emergency HOME TBRA Sample Owner Certification may be used by PJs to implement their local programs in response to the COVID-19 pandemic. The sample form assumes the use of all available waivers related to emergency TBRA as outlined in the April 2020 TBRA Memo and is a companion to the Emergency HOME TBRA Sample Application that a low-income household would complete. PJs may use

Resources



Resources

General HOME Statutory Suspensions & Regulatory Waivers Memos

<https://www.hudexchange.info/resource/6016/cpd-memo-availability-waivers-suspensions-home-requirements-covid-19/>

Emergency HOME TBRA Statutory Suspensions & Regulatory Waivers Memos

<https://www.hudexchange.info/resource/6017/cpd-memo-suspensions-waivers-home-tbra-covid-19/>

HOME COVID Guidance

<https://www.hudexchange.info/programs/home/covid-19/>

TBRA Toolkit

<https://www.hudexchange.info/programs/home/covid-19/#emergency-tbra>



Questions

