



Public Housing Programs Could Benefit from Greater Flexibility

Learning from the COVID-19 Pandemic Experience

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May 2021

In March 2020, the COVID-19 pandemic forced many public housing authorities (PHAs) to quickly adjust their operational procedures to protect their staff while providing emergency assistance to residents. Many PHAs had to close their offices and convert to remote operations almost overnight, while staff focused on supporting their tenants by delivering them food, doing wellness checks for vulnerable residents, and ensuring they had access to and in some cases providing the technology needed for children to attend school remotely and isolated residents to remain connected to friends, family, and service providers.¹ Moreover, as the economic crisis caused by the pandemic worsened, PHAs were under pressure to rapidly adjust rents for tenants who had lost income and process housing choice voucher (HCV) applications so people could use their vouchers to find housing.

At the onset of the pandemic in the United States, many PHAs across the country had to make rapid decisions and purchase supplies and technology in some cases without preapproval from the Department of Housing and Urban Development (HUD).² Typically, most PHAs have little flexibility in this area: HUD provides funding directly to public housing authorities and regulates how they spend their operating funds and deliver their programs and services, and only the few Moving to Work authorities can shift funds without prior HUD approval (Stacy et al. 2020). However, residents' pressing needs required PHAs to act quickly without the usual preapproval processes.

About the Housing Crisis Research Collaborative

The Housing Crisis Research Collaborative aims to address the long-standing inequities in access to safe, stable, and affordable rental housing that have been laid bare by the COVID-19 pandemic. We provide policymakers at all levels of government with the data and analysis they need to design, implement, and evaluate more equitable and effective rental housing and community development responses to the pandemic and the ongoing rental housing affordability crisis. More information is available at <https://housingcrisisresearch.org/>.

In late March 2020, Congress passed the Coronavirus Aid, Relief, and Economic Security Act, which allocated funding for PHAs to bolster their emergency responses. Allowable expenditures included personal protective equipment for staff, supplemental service coordination for residents, and other expenses incurred in response to the pandemic.³

Public housing authorities were granted greater flexibility in spending shortly thereafter. In April 2020, HUD announced a series of regulatory and statutory waivers for the public housing, Housing Choice Voucher, Indian Housing Block Grant, and Indian Community Development Block Grant programs. These waivers were intended to provide PHAs with the administrative flexibilities necessary to maintain operations during the pandemic and keep residents and clients stably housed. In November 2020, HUD released an expanded list of regulatory and statutory waivers that extended the applicability of some of the previously issued waivers. A list of all of the 64 waivers HUD has issued, their regulatory and statutory authority, and the periods of their availability can be found in Notice PIH 2020-33.⁴

The waivers pertain to a range of issues, from PHAs' administrative plans to inspections. Public housing authorities were allowed to adopt or not adopt any of the 64 waivers, which they did depending on program type and need. Although adopting the waivers was voluntary, HUD encouraged all PHAs to use "any and all waivers and alternative requirements as necessary to keep public housing and HCV programs operational to the extent practicable."⁵ HUD required PHAs to notify it of the waivers they adopted through a board resolution from the board of commissioners. HUD also required authorities to publicly post (or otherwise make publicly available) the list of waivers and alternative requirements they adopted. Though the availability periods vary, the majority of waivers are set to expire on June 30, 2021.

In early 2021, we interviewed leaders from 10 PHAs across the country to understand how the PHAs and HUD responded to the crisis. Their insights show how PHAs can and did operate more flexibly than under normal circumstances to respond to residents' needs, and which of the provisions and flexibilities HUD implemented during the pandemic should be made permanent. This brief summarizes findings from these interviews.

Methods

To ensure we spoke to leaders representing small and large PHAs and different regions of the country,⁶ we asked three housing industry organizations—the Council of Large Public Housing Authorities, the National Association of Housing and Redevelopment Officials, and the Public Housing Authorities Directors Association—to recommend PHAs for us to contact for interviews. Table 1 shows the size and regions of the 10 PHAs we selected.

TABLE 1

Characteristics of the Public Housing Authorities Involved in This Study

	Small	Medium	Large	Total
West	0	2	1	3
Midwest	0	1	1	2
South	0	0	2	2
Northeast	1	1	1	3
Total	1	4	5	10

Source: Urban research team.

Notes: Size categories include public housing units and voucher programs. We have used Department of Housing and Urban Development guidance to classify small public housing authorities as having 0–249 units, medium as having 250–1,249, and large as having 1,250–10,000+.

Preparedness for and Adaptations in Response to the COVID-19 Pandemic

Public housing authorities have faced unique challenges during the pandemic owing to the varying needs of the diverse populations they serve and their business model, which relies heavily on on-site and in-person service provision. Nationwide, approximately 3,300 PHAs serve approximately 1.8 million public housing residents and 5.2 million HCV program participants, meaning PHAs have had to shift a business model that serves roughly 7 million people with extremely low incomes and few resources of their own (Docter and Galvez 2020).

It is also important to note that most people living in public housing are people of color: 45 percent of public housing households are Black and 21 percent are Latinx. Moreover, 33 percent of HCV households are Black and 13 percent are Latinx.⁷ Black and Latinx households, which were overrepresented in industries hit hardest by the pandemic and shelter-in-place orders, continue to be disproportionately affected by the pandemic's health and economic consequences. Further, Black and Latinx workers were already experiencing higher unemployment rates than white workers before the crisis, and during the crisis these rates have reached historic highs.⁸ Therefore, PHAs have responded to a public health and racial equity crisis.

From the first weeks of the pandemic, PHAs acted quickly to respond to the new demands on staff and residents. Some PHAs experienced challenges to service provision and barriers to maintaining

normal operations. The leaders we spoke with listed examples of initial challenges requiring quick adaptation that included the following:

- **Collecting information from third-party employers and getting third-party verifications.** During the initial months of the pandemic, many people lost their jobs or hours as businesses temporarily or permanently closed. Many businesses that verify information used by PHAs to qualify households for assistance and/or to recalibrate levels of assistance for those whose incomes have changed were among those forced to reduce hours, lay off employees, and adapt to remote working practices. This made it difficult for PHAs and their residents to collect, share, and verify updated employment information.
- **Adapting to remote work.** Some PHA leaders said that they initially struggled with the move to remote work. One noted, “Working from home was initially a struggle because the agency is just so paper driven—which was our biggest hurdle because we couldn’t take anything home.”⁹ Others said the magnitude of the disruption created difficulties acquiring cleaning supplies, laptops for remote work, and other necessary equipment.
- **Shifting to remote briefings, inspections, and maintenance requests.** Digital access has been critical during the pandemic, as many of the activities PHAs perform, from new tenant briefings to inspections and maintenance requests, have shifted from their traditionally in-person model to a virtual one. This shift has presented a unique challenge for PHAs, many of which serve areas with limited broadband access. One interviewee mentioned that the frequent snowstorms in their area were a “blessing in disguise” that had pushed the staff at their PHA over the years to slowly add technology-based ways to interact with their residents during bad storms. Some PHAs already had online portals for submitting information like income changes before the pandemic and could simply expand the use of these portals and provide residents internet hot spots and tablets as needed.
- **Keeping residents informed of the evolving pandemic guidelines and related organizational changes.** Public housing authorities, particularly those serving many older adults,¹⁰ had to find creative ways to keep their residents informed about updated guidance related to the pandemic, including waivers. Some found it easier to make minor adaptations to their on-site practices and develop plans for continuing operations without fully closing their doors.
- **Adjusting rents as people lost jobs and income because of the pandemic.** Public housing authorities typically set rents as a percentage of income. Under normal circumstances, households notify their PHA when they experience a loss of income and apply for a rent adjustment, and the PHA acts on the request. Pandemic-related job loss was especially acute for low-income workers and Black and Latinx households,¹¹ and PHAs had to quickly adjust rents through remote processes. As an interviewee from a small northeastern PHA put it, “In the family units, almost every employed person lost their job. So that was a priority: getting their rents adjusted quickly. We needed to get people's rent reduced, fast.”¹²

The majority of PHA leaders we spoke with told us they had to quickly make changes, which included the following:

- purchasing personal protective equipment for their residents and staff
- making physical changes to office spaces like creating new drop-off and pickup mailboxes to limit residents' interaction with staff
- reducing the number of staff on site or closing the site and implementing remote work
- ordering laptops and phones to ensure staff could remain connected
- acquiring licenses and technology (e.g., DocuSign) to allow for things like electronic briefings and remote signatures
- adjusting hours of operation to better assist families when they were available

Housing authorities responded well because they're not unaccustomed to responding to crisis situations, whether it's with an individual or with a family.

—Representative from a large PHA

Statutory and Regulatory Waivers

The waivers HUD issued in April 2020 dovetailed with many of the strategies PHAs were already undertaking in the month before their release, supplementing their capacity to respond to the pandemic. The waivers covered a wide range of issues, including allowable protocols for voucher briefings and remote inspections, processes for income verification, extensions of search terms for housing vouchers, administrative relief and performance scoring relief, and the performance designation for PHAs based on factors like financial condition, physical condition, and management operation indicators (table 2).

TABLE 2

Waivers Provided by the Department of Housing and Urban Development for Public Housing Authorities by Type

Waiver or alternative requirement category	Number of waivers
Waivers applicable to both the public housing and Housing Choice Voucher programs	7
Housing Choice Voucher program waivers: Housing Quality Standards inspections	11
Housing Choice Voucher program waivers: general	14
Public housing program waivers	14
PHAS, SEMAP, and Uniform Financial Reporting Standards	5
Other waivers and administrative relief	13
Total	64

Source: Department of Housing and Urban Development, Office of Public and Indian Housing, "Notice PIH 2020-33(HA), REV-2," November 30, 2020, https://www.hud.gov/sites/dfiles/PIH/documents/PIH%202020-33_rev%2012.14.pdf.

Notes: PHAS = Public Housing Assessment System. SEMAP = Section Eight Management Assessment Program. This table counts waivers the Department of Housing and Urban Development released in November 2020, which built on the first round of waivers released in April 2020.

The 10 PHA leaders we interviewed said the types of programs their PHAs administered (i.e., public housing programs, HCV programs, or both) partially impacted which waivers they chose to adopt. Moreover, they took different approaches to adopting the waivers: some PHAs opted for blanket adoption, whereby housing authority boards adopted all of the waivers in a single action, whereas others took a piecemeal approach, adopting select waivers initially and returning to their boards for approval of additional waivers if necessary. Those that took the blanket approach did so because they were uncertain what the world would look like six months later and what flexibilities they might need in the longer term. That approach allowed for maximum flexibility and nimbleness, even if the PHAs did not end up using some of the waivers they adopted. It also spared them the time associated with having to return to their boards for additional approvals when gathering for official meetings was challenging.

Useful Waivers

A key theme in our interviews was that leaders had ideas for maximizing their PHAs' efficiency that predated the pandemic, but that they had never had the authority to implement them. The HUD waivers gave PHAs the flexibility to conserve time and resources while continuing to serve residents. We asked the leaders we interviewed which waivers they found the most useful for their overall operational effectiveness and ability to serve residents and clients during the ongoing pandemic. The most commonly cited waivers were the following:

- allowance of remote hearings, briefings, and housing counseling
- allowance of unit-owner certification in lieu of inspection, and alternative methods and/or timelines for unit inspection

- delaying of annual reexaminations of family income and composition, allowance of self-certifications of income, and forgoing of third-party income verification requirements
- discretionary extension of voucher search terms
- approval of assisted tenancy and execution of Housing Assistance Payment (HAP) contracts

ALLOWANCE OF REMOTE HEARINGS, BRIEFINGS, AND HOUSING COUNSELING

HUD first referenced waivers allowing PHAs to shift to remote briefings and hearings in July 2020 in Notice PIH 2020-13,¹³ but it did not issue formal guidance on remote briefings and hearings until November 2020. The November 2020 notice clarifies that “remote briefings” are essentially interchangeable with the “oral briefings” PHAs are required to provide to residents and clients per the various statutes governing the public housing and HCV programs.¹⁴ Therefore, some PHAs noted that remote briefings were actually always “allowable” and the guidance issued in November 2020 was simply a clarification of the existing regulatory requirements rather than an actual waiver.

Public housing authorities took remote briefings in stride. The mechanisms with which they provided remote briefings varied and included virtual meeting platforms like Zoom and FaceTime and video presentations hosted on organizations’ websites. The leaders we spoke to generally appreciated the shift to remote briefings. Some noted that even before the pandemic, many families had a hard time securing transportation to attend the briefings, especially older adults and people with disabilities. Two interviewees told us they had created innovative mechanisms for getting the necessary paperwork to clients before briefings, including a curbside pickup day for different assisted housing programs whereby residents could “drive by” and pick up information packets without incurring parking costs. A staff member would then later walk them through the information over the phone.

Would like to keep this [the remote briefings]. It’s not as time consuming for staff, and they are also easier for our clients, as well, because they don’t have to travel to our office, especially for families without a car or with a disability.

—Executive director of a large PHA

ALLOWANCE OF OWNER CERTIFICATION IN LIEU OF INSPECTION, AND ALTERNATIVE METHODS AND/OR TIMELINES FOR INSPECTION

The PHA leaders we spoke with found the ability to accept owner certifications in lieu of actual unit inspections helpful for quickly getting voucher holders housed and keeping tenants stably housed and helping them make payments. Typically, HUD regulations require PHAs to regularly inspect their public housing units and project-based voucher units, and to inspect all units before approving them for HCV holders (HUD 2001). The November 2020 HUD notice included waivers regarding initial inspections for

new HAP contracts, interim inspections, annual inspections, turnover unit inspections, and replacement unit inspections.¹⁵

Leaders from PHAs with HCV programs told us that the inspection waivers have aided lease-up during the pandemic, when it has been imperative for families to find housing and remain stably housed. In addition to accepting owner certifications, PHAs have also used alternative methods of inspections like virtual inspections and remote video inspections, which in some cases tenants have conducted while on the phone with inspectors or via video footage of their units (taken with guidance from their PHAs) that inspectors have then reviewed. Several interviewees noted the importance of building trust with landlords and being able to rely on them to have their units in good condition. One interviewee told us they had initially been hesitant to adopt remote inspections but were pleasantly surprised by their ability to surface housing quality concerns and improve remote workflow, saying, “To my surprise, a lot of the inspectors have found concerns via remote inspections—this was one of my initial concerns—that we wouldn’t be able to see deficiencies in the unit during remote inspections.”¹⁶

The lease-up process was faster during remote inspections. We were able to get more inspections done in the course of a day.

—Executive director of a large PHA

DELAYING OF ANNUAL REEXAMINATIONS OF FAMILY INCOME AND COMPOSITION, ALLOWANCE OF SELF-CERTIFICATIONS OF INCOME, AND FORGOING OF THIRD-PARTY INCOME-VERIFICATION REQUIREMENTS

HUD’s guidelines have traditionally outlined a required, hierarchical income-verification process that PHAs must follow. This means there are various income-verification techniques PHAs can use, but HUD considers up-front income verification the most preferred form of verification, third-party verification as acceptable but not optimal, and tenant declaration the method of last resort when PHAs cannot obtain any type of third-party verification.¹⁷ HUD requires PHAs to verify family income using its Enterprise Income Verification (EIV) system,¹⁸ which provides a third-party source for verifying tenant employment and income information during mandatory reexaminations and recertifications of family composition and income. One waiver also allows PHAs to forgo third-party income verification, including the use of the EIV system, and considers self-certification the highest form of income verification for processing annual reexaminations. This waiver applies to the public housing and Housing Choice Voucher programs. Most PHA leaders we spoke with noted that the income self-certification waivers have been critical because many businesses have closed and lack the staff to return the income-verification paperwork.

I wasn't going to tell someone who suddenly had no income "sorry we have to wait for your employer to verify you were laid off." This waiver was good for tenants.

—Executive Director of a small PHA

DISCRETIONARY EXTENSION OF VOUCHER SEARCH TERMS

In their administrative plans, PHAs outline their processes for extending the periods for voucher holders to use their vouchers before they expire. There are many reasons a PHA may have to provide such an extension to the unit search term, and PHAs can do so as long as they are in accordance with their administrative plans. One HUD-issued waiver waived the requirement that extensions of voucher search terms be in accordance with PHAs' administrative plans, thereby allowing PHAs complete discretion during the effective waiver period.

Five interviewees noted that search-term extensions for housing vouchers had been critical given the challenges of moving during the pandemic. They attributed this to low turnover in units because of people's fear of moving and the impact that low turnover was having on their clients' ability to secure housing. One interviewee explained, "People just don't want to move right now, and we don't have enough landlords. Any extra flexibility we can provide, especially for our disabled residents, has been critical."¹⁹

We have more than used this extension to actually get people into housing. One of the things that, nationwide, we've seen is that we don't have enough landlords. Landlords don't have the incentives—at least to our voucher clients—so therefore we have a shortage of voucher units. They are clients who need that time to get out there and find the unit, so we have been using the extensions and would like to see that to expand a little bit more to give us a little bit more flexibility on those extensions when needed.

—Leader from a medium PHA

APPROVAL OF ASSISTED TENANCY AND EXECUTION OF HAP CONTRACTS

Finally, many of the interviewees said their PHAs had adopted the waiver of the 60-day deadline for executing HAP contracts, which enables PHAs to pay private landlords.²⁰ This waiver allows PHAs to

execute HAP contracts after the 60-day deadline has passed and to make housing assistance payments back to the beginning of the lease term.

The PHA staff we interviewed mentioned that several other waivers had been helpful, particularly the one waiving the requirement that public housing residents contribute eight hours a month of community service or participate in an economic self-sufficiency program, or a combination of both. Some PHA leaders and Public Housing Authorities Directors Association representatives noted that this statutory requirement was an unfunded mandate and administratively burdensome, even before the pandemic.

Waivers PHA Leaders Would Like to Become Permanent

There was significant overlap between the waivers PHA leaders hoped to keep and the ones they said were useful. However, leaders from several PHAs acknowledged that some of the waivers that may have been immediately useful for responding to the pandemic may not be appropriate for long-term adoption, particularly the waivers around unit inspections.

Virtually everyone we spoke to wanted to continue using **remote hearings and briefings, which they anticipated doing because, through the waivers, HUD clarified the definition and interpretation of “oral briefing.”** One interviewee noted that this clarification was “super beneficial,” especially for residents who struggle to secure transportation or face other barriers getting to the PHA office, such as finding child care. Four others commented that remote hearings and briefings created efficiencies and helped their staff move clients through the application and move-in process faster, saving time and resources. It is important to note that this waiver explicitly clarified the allowance of remote briefings under existing regulations, and industry organizations like the Council of Large Public Housing Authorities and the National Association of Housing and Redevelopment Officials believe oral briefings held virtually were already permitted under 24 CFR § 982.301(a)(1) before HUD issued the waivers.²¹ Nevertheless, many PHAs felt that, should this waiver expire, continued clarity around HUD’s long-term intentions to permit remote briefings would be useful.

Leaders from PHAs of every size, location, program type, and census region found the guidance allowing remote briefings and waivers allowing remote inspections useful, as all faced the same inability to meet with residents face-to-face. Most of the leaders we spoke to wanted to keep some form of remote inspections and/or remote briefings in particular cases, and many had acquired technologies they would not have purchased if not for the pandemic. One director from a medium, southern PHA shared, “Remote inspections are useful just in case there’s somebody with a vulnerability, sensitivity, or mental health issue. It would make it easier if the inspector didn’t have to enter their unit.”²²

However, remote briefings and inspections require devices and reliable internet access, which are out of reach for many public housing tenants and are impractical for many older adults and people with disabilities. This concern about the digital divide and the implications for households of color, people with disabilities, and seniors—all vulnerable and/or disproportionately impacted populations served by the public housing and HCV programs—is significant and requires further exploration within an equity

framework. Some affordable housing providers are working directly with small internet service providers, like Starry in Boston, Denver, Los Angeles, New York, and Washington, DC, to provide low-cost service to residents, while others are implementing device- and hot spot-lending programs or installing community hot spots (Asher, Arnold, and Nassau-Brownstone 2021).

We hope that HUD will make them [remote hearings and briefings] permanent. We've been operating successfully for a year now without seeing our participants in person. Why would we ever go back to entangling people to take off work, find child care, when we can do them [briefings] without creating those problems?

– Executive director of a large PHA

Leaders would also like to see **family income self-certification and the ability to forgo third-party income verification requirements** made permanent. Interviewees noted that income self-certification is valid and that HUD's third-party verification requirements that require PHAs to use EIV as a third-party source to verify tenant employment and income information during mandatory reexaminations or recertification of family composition and income are unnecessary, delay processing, and add administrative burden. Under the current waivers, under self-certification, verification may occur over the phone (with a contemporaneous written record by the PHA staff person), through an email with a self-certification form by the family, or through other electronic communications. Public housing authorities that conduct interim reexaminations under this waiver are responsible for addressing any material discrepancies that arise and should be able to cross-reference tenant self-certifications with the EIV Income Validation Reports on the back end as necessary.

There was less agreement about whether two other waivers should be made permanent: owner certification in lieu of inspection, and alternative methods and/or timelines for inspection. The majority of respondents were interested in keeping the flexibility afforded by these waivers, seeing them as promoting program efficiency, but two respondents said in-person inspections are needed to ensure housing quality, especially for tenant-based voucher units.

Three respondents mentioned wanting to keep **extensions of voucher search terms**. In addition to allowing PHAs to stop imposing stressful, arbitrary time constraints on residents, this waiver was helpful, particularly in more competitive housing markets with lower vacancy rates, because it allowed residents more time to find housing in their preferred neighborhoods. This has been especially important during the pandemic because people have stayed housed in place longer than usual. As one interviewee explained, "The moratorium is keeping people in place. Normally you have this...natural turnover in units. We're not seeing that. So, the people that have been issued a voucher within the past six months, they are finding it harder to find housing."²³ One interviewee mentioned that their county's

housing market was tight even before the pandemic, and that retaining the ability to extend search terms would allow residents more opportunities to find housing in high-opportunity neighborhoods. Vouchers have served as a powerful tool to remedy historically racist housing policies, which have concentrated federally subsidized housing in neighborhoods with high poverty rates while discriminatory lending practices have encouraged white homeownership in suburbs and high-opportunity neighborhoods.²⁴ Given lack of turnover because of the pandemic, and notwithstanding the need for additional source-of-income protections in many areas, extending search terms may help ensure that vouchers continue to be a useful tool for combating segregation (Galvez et al. 2020).

Finally, most PHA leaders mentioned the potential benefits of permanently enabling extensions of HAP contract signing deadlines and eliminating the community service requirement for public housing residents.

Differences between Types of PHAs

We deliberately interviewed leaders from a cross-section of PHAs to understand whether local context and successes and challenges of waiver adoption and implementation varied by region, size, and location (among other factors). We found **little variation in the scope of work** PHAs had to undertake in response to the COVID-19 crisis; however, large and small PHAs have faced different challenges during the pandemic. These include the following:

- **Larger PHAs employ many more people than small PHAs and therefore had to acquire more technology to shift employees to remote work.** For example, one large, midwestern PHA had to acquire laptops and tablets for upwards of 100 people to enable them to work remotely. A leader from a medium, western PHA shared that they initially had trouble getting equipment and supplies for staff.
- **Larger PHAs serve more diverse resident populations**, including older adults (many of whom are on the other side of the digital divide), people with disabilities, youth and young adults, and people whose cultural practices require respect, care, and attention. For example, one large PHA that serves a large refugee population had to build trust with residents to get them to accept assistance and participate in efforts like vaccine clinics.
- **Larger PHAs have the benefit of economies of scale**, meaning they were more prepared from a technological standpoint and had things that many small PHAs lacked, like online portals for document verification and submission and existing continuity-of-operations plans, in addition to more robust information technology departments.

Through our interviews with PHA leaders, we observed that the impacts of waivers on HCV lease-ups differed, and these differences appeared to depend less on the factors we examined (e.g., size and program type) and more on regional housing market conditions. Across the board, interviewees said alternative forms of briefing have been critical to getting vouchers out the door. However, some PHA leaders said lease-ups have decreased because residents are generally reluctant to move.

Waivers in the Context of PHA Assessments

One challenge that three PHA leaders mentioned was uncertainty about what will happen after the pandemic. For example, two shared concerns about how they will be scored in assessments like the Section Eight Management Assessment Program and the Public Housing Assessment System. The Section Eight Management Assessment Program measures the performance of PHAs that administer the HCV program across 14 areas, and the Public Housing Assessment System is the system that HUD uses to assess each PHA's performance in managing its public housing portfolio. Inspections are a critical component of Public Housing Assessment System scoring, so with the waivers allowing inspections to be postponed except for life-threatening issues, interviewees were concerned how their scoring might be impacted given the relationship between Public Housing Assessment System scores and operations and funding. For example, HUD uses the scores to determine frequency of reviews and monitoring and these scores can determine PHAs' ability to qualify for bonus points in HUD funding competitions.

However, HUD has since waived the inspection requirement for the Public Housing Assessment System and will not issue scores that were pending for the 2020 fiscal year unless PHAs request them. Instead, for any PHAs with a fiscal year end of March 31, 2020, HUD will not issue a new Public Housing Assessment System score and will instead carry forward the most recent score on record. HUD also will not issue Section Eight Management Assessment Program scores that are pending or for the fiscal year 2020. HUD is currently scheduled to begin issuing new Public Housing Assessment System and Section Eight Management Assessment Program scores that have a fiscal year end date of March 31, 2021, but many of the waivers have been extended through June 2021, causing much uncertainty for PHAs.

Takeaways for Policymakers and Practitioners

Moving forward, policymakers and practitioners can focus on preserving the flexibility that the waivers issued in response to the pandemic offer. The waivers have afforded PHAs the agency to serve their clients nimbly by leveraging remote and expedited strategies that many were working toward before the pandemic. Moreover, some PHAs have adopted waivers that they have not had to use. Overall, PHA leaders emphasized that although the pandemic has been challenging, they have learned a lot about what is possible. To preserve the waivers' benefits, practitioners and policymakers can do the following.

Explore the statutory and regulatory changes necessary to make permanent the waivers that have provided effective alternative mechanisms for program management and administration. These include remote hearings and briefings, alternative methods of unit inspection (including owner self-certification for HCV units), remote inspections for public housing units, income self-certification and forgoing of third-party income verification, extensions of voucher search terms, and extensions of HAP contract periods.

Survey PHAs, residents, voucher holders, and landlords about their experiences with the HUD waivers with a particular focus on understanding the racial equity implications of waiver adoption.

Leverage those lessons to pursue broader regulatory relief for PHAs that would improve client and resident service delivery, increase voucher use, and increase landlord engagement in HCV programs. And understand, particularly from the tenants, how waiver adoption has created opportunities or challenges to advancing racial equity and addressing the disproportionate impact of the pandemic on Black and Latinx households. For example, given that people living in public housing are disproportionately people of color, assessing whether they see the waivers and flexibilities as improvements in service that impact their quality of life and housing stability are important racial equity implications to explore. Furthermore, assessing whether flexibilities like extensions of voucher search terms increase mobility and access to high-opportunity neighborhoods for households of color is important for advancing racial equity.

Acknowledge that though PHAs know their residents and communities best, they often look to regional offices for guidance and leadership. Written guidance from regional offices on available waivers and which ones PHAs are allowed and encouraged to pursue has been critical for PHAs pushing the limits of innovation with fear of back-end compliance issues. Therefore, strengthening PHAs' communication with and support from regional offices is critical for them to feel comfortable taking actions that will help them better serve their residents.

Notes

- ¹ Mica O'Brien and Susan J. Popkin, "How Public Housing Authorities Are Supporting Vulnerable Residents during COVID-19," *Urban Wire* (blog), Urban Institute, April 20, 2020, <https://www.urban.org/urban-wire/how-public-housing-authorities-are-supporting-vulnerable-residents-during-covid-19>.
- ² Benny Docter and Susan J. Popkin, "Why Public Housing Authorities Need More Funding to Continue Their Rapid Response to the COVID-19 Pandemic," *Urban Wire* (blog), Urban Institute, June 11, 2020, <https://www.urban.org/urban-wire/why-public-housing-authorities-need-more-funding-continue-their-rapid-response-covid-19-pandemic#:~:text=Institute%20Fellow-,Why%20Public%20Housing%20Authorities%20Need%20More%20Funding%20to%20Continue%20Their,to%20the%20COVID%2D19%20Pandemic&text=To%20ensure%20PHAs%20can%20continue,funding%20as%20quickly%20as%20possible>.
- ³ Department of Housing and Urban Development, "HUD Allocates Second Wave of Relief Funds, Over Half a Billion Dollars to Help Protect Low-Income Americans," HUD press release no. 20-058, May 1, 2020, https://www.hud.gov/press/press_releases_media_advisories/HUD_No_20_058.
- ⁴ Department of Housing and Urban Development, Office of Public and Indian Housing, "Notice PIH 2020-33 (HA), REV-2," November 30, 2020, https://www.hud.gov/sites/dfiles/PIH/documents/PIH%202020-33_rev%2012.14.pdf.
- ⁵ Department of Housing and Urban Development, Office of Public and Indian Housing, "Notice PIH 2020-05," April 10, 2020, <https://www.hud.gov/sites/dfiles/PIH/documents/PIH2020-05.pdf>.
- ⁶ We have used Department of Housing and Urban Development guidance to classify small public housing authorities as having 0–249 units, medium as having 250–1,249, and large as having 1,250–10,000+.
- ⁷ HUD picture of subsidized households data, 2020 US totals, accessed April 21, 2021, https://www.huduser.gov/portal/datasets/assthsg.html#2009-2020_data.

- ⁸ Steven Brown, “The COVID-19 Crisis Continues to Have Uneven Economic Impact by Race and Ethnicity,” *Urban Wire* (blog), Urban Institute, July 1, 2020, <https://www.urban.org/urban-wire/covid-19-crisis-continues-have-uneven-economic-impact-race-and-ethnicity>.
- ⁹ PHA leader, interview with Urban research team conducted February 2021.
- ¹⁰ O’Brien and Popkin, “How Public Housing Authorities Are Supporting Vulnerable Residents during COVID-19.”
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Acknowledgments

The Housing Crisis Research Collaborative is supported by the Wells Fargo Foundation and JPMorgan Chase & Co. and managed by the Urban Institute. We are grateful to them for allowing the collaborative to advance its goals.

The views expressed are those of the authors and should not be attributed to the Urban Institute, its trustees, or its funders. Funders do not determine research findings or the insights and recommendations of Urban experts. Further information on the Urban Institute’s funding principles is available at urban.org/fundingprinciples.

We are grateful to the Council of Large Public Housing Authorities, the National Association of Housing and Redevelopment Officials, the Public Housing Authorities Directors Association, and the public housing authorities for speaking with us for this project. We also thank our reviewers, Reed Jordan at the Wells Fargo Foundation and Katherine M. O’Regan at New York University’s Wagner Graduate School of Public Service. Finally, we thank our Urban Institute colleague Zach VeShancey for his excellent editorial support.



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