

## **ADDENDUM TO OPERATING GUIDELINES FOR TENANT BASED RENTAL ASSISTANCE PROGRAMS**

On April 10, 2020, the Housing and Urban Development Department, HUD, issued a memorandum, entitled "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." The memorandum prioritized the immediate housing needs of those impacted by COVID-19 and the prevention of the spread of COVID-19 and to achieve such ends, provided for numerous waivers and suspensions in current federal regulations and policies. The City's Community Development Department applied for and was granted the waivers and suspensions on April 22, 2020.

The following waivers and suspensions, among others, were granted and impact the administration of the HOME Tenant Rental Based Assistance Program (TBRA) which provides rental assistance to low income individuals and families in Huntington Beach. At this time, these waivers and suspensions are effective until December 31, 2020.

- **HOME Program – Tenant Selection and Targeted Assistance**  
Under the new but temporary guidelines, authorized under the waiver, the City will not be required to establish new or revised written tenant selection criteria that are consistent with the local housing needs and priorities established in the Consolidated Plan. The purpose of this waiver is to ensure that those individuals impacted by COVID 19, who may not have been anticipated during the creation of the Consolidated Plan, are assisted expeditiously.
- **HOME Program – Rent Reasonableness**  
Under the new but temporary guidelines, authorized under the suspension, agencies implementing TBRA programs on behalf of the City are allowed to provide rental assistance without requiring a rent reasonableness assessment. The purpose of this waiver is to focus on providing immediate housing for income-eligible persons who are not stably housed and to help income-eligible persons who are currently housed but cannot pay rent and/or utilities due to reduced wages
- **HOME Program - Eligible Tenant-based Rental Assistance Costs and Maximum TBRA Subsidy**  
Under the new but temporary guidelines, authorized under the waiver, agencies implementing TBRA programs on behalf of the City are allowed to pay the full cost of monthly utilities in addition to the rental assistance and security deposit payments for new and existing TBRA families affected by the COVID-19 pandemic. The purpose of this waiver is to ensure that households remain safe and sanitary if the renters have suffered from job or income loss due to the pandemic.
- **HOME Program - Term of Rental Assistance Contract**

Under the new but temporary guidelines, authorized under the waiver, agencies implementing TBRA programs on behalf of the City are no longer required to execute a rental assistance contract to begin on the first day of the term of the lease. The purpose of this waiver is to ensure that tenants who are currently housed but negatively impacted by COVID-19 can remain in their rental agreements.

- **HOME Program – Tenant Protections-Lease**

Under the new but temporary guidelines, authorized under the waiver, agencies implementing TBRA programs on behalf of the City are allowed to provide rental assistance to individuals who are currently housed, under an executed lease, but are facing financial hardship. The purpose of this waiver is to focus on providing immediate housing assistance to individuals in rental units who are unable to pay rent and/or utilities due to job loss and/or reduced wages.

- **HOME Program – Housing Quality Standards**

Under the new but temporary guidelines, authorized under the waiver, agencies implementing TBRA programs on behalf of the City are no longer required to conduct a Housing Quality Standards (HSQ) inspection prior to occupancy. The purpose of this waiver is to expedite stable housing for individuals who are facing financial hardship and need immediate rental assistance and to protect the risk of housing inspectors contracting or spreading COVID 19.

- **HOME Program – Annual Inspection of Units Occupied by Recipients of HOME TBRA**

Under the new but temporary guidelines, authorized under the waiver, agencies implementing TBRA programs on behalf of the City are no longer required to annually inspect each unit occupied by a TBRA recipient. The purpose of this waiver is to protect the health of both inspectors and tenants by observing physical distancing to limit the spread of COVID-19.

- **HOME Program - Income Determinations**

Under the new but temporary guidelines, authorized under the waiver, agencies implementing TBA programs on behalf of the City are no longer required to determine a tenant's annual income by examining at least two months of source documentation evidencing income and projecting anticipated income forward for the next 12 months. The purpose of this waiver is to allow tenants to self-certify their incomes to reflect current income status.

HUD will be issuing further guidance on the waivers and suspensions. The City will adopt these guidelines within the program's operating guidelines to ensure low income residents of Huntington Beach will be afforded maximum access to this program. The City will be required to provide written documentation of the changes to operating procedures and work closely with the service providers to ensure compliance of the modified regulations during the pandemic and its aftermath.