

* Effective Immediately

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4/24/2020

MEMORANDUM

TO: MICHAEL J. JOHNSTON, EXECUTIVE DIRECTOR
FROM: HANNAH BOLCOME, DIRECTOR OF LEASED HOUSING
SUBJECT: AMENDMENT TO PART I OF THE ADMINISTRATIVE PLAN FOR THE HOUSING CHOICE VOUCHER PROGRAM – EMERGENCY STATUS PROVISIONS
DATE: APRIL 21, 2020
CC: BRENDA DOWNING, DEPUTY EXECUTIVE DIRECTOR

This memorandum recommends that the Cambridge Housing Authority (CHA) amend the Emergency Status provision found in Chapter 3 of Part I of the Administrative Plan for the Federal Housing Choice Voucher Program (and any other relevant policy documentation that references these provisions as such) to **temporarily suspend and remove the policy language regarding “in-place” vouchers**, which are currently available to emergency applicants who do not meet the CHA’s emergency criteria for no-fault eviction but meet several other criteria (as detailed below) related to housing affordability in their current Cambridge unit.

The “in-place” voucher criteria is a sub-category of CHA’s no-fault eviction criteria. It states that for applicants that do not meet the criteria for “no-fault” eviction and are not otherwise qualified for emergency status, CHA will screen for issuance of an expedited “emergency” Housing Choice Voucher to an applicant living in Cambridge who is (1) earning no more than 80% of area median income (AMI) and (2) is faced with a rent increase of 25% or more OR has a shelter burden (using CHA’s utility allowance) of 40% or more of gross household income, and (3) that has resided in a Cambridge apartment for a period of at least one year, and (4) where the owner of such apartment was willing to enter into a Housing Choice Voucher Housing Assistance Payment Contract for the unit in which the applicant was living or another appropriately sized Cambridge apartment owned by the same landlord or affiliated landlord.

Currently, there is a statewide moratorium on evictions until the state of emergency has been lifted. In addition the City of Cambridge has issued a policy order requesting for property owners and landlords throughout the City to forego rent increases for at least a 60-day period and allow tenants who have demonstrated a substantial loss of income due to COVID-19 a 120-day grace period to become current with rent. Additionally, households in Cambridge who have experienced a temporary loss of income due to COVID-19 may also access the Mayor’s Disaster Relief Fund and/or may be eligible to access state funding through the Residential Assistance for Families in Transition (RAFT) program, or other state or local resources.

CHA feels that with these additional protections in place, the temporary suspension of this aspect of the criteria will not have a significant impact on potential applicant and/or will not lead to further displacement of residents. Furthermore, CHA is currently working on a **revised new criteria** to permanently replace the in-place criteria, and intends to have policy language prepared in the next few weeks. The new criteria will seek to provide a mechanism for Cambridge residents who have

experienced a loss of income or are otherwise rent burdened to receive assistance, under specific and established criteria.

CHA continues to explore ways to respond to the COVID-19 crisis in order to protect its participants while also being able to continue to serve applicants off of the waitlists – both emergency and non-emergency applicants – to the extent possible given available resources. In response to COVID-19, CHA has made temporary modifications to its interim rent policies in order to make the rent adjustment process for existing participants experiencing income loss easier and more expeditious. As a result of many participants experiencing income losses due to COVID-19, CHA expects to see an increase in subsidy costs of at least \$170,000 per month over the next several months. In addition, CHA has incurred additional administrative and operating costs as well as costs due to the delays in construction on many of its recapitalization projects. CHA's remains committed to continuing to fund all of its existing commitments, with its first priority being making timely rent adjustments for participants who have experienced losses of income. CHA will continue to take applications and issue vouchers as resources are available. However, CHA unfortunately does not have the resources available to keep the "in-place" voucher criteria in effect at this time, due to the added demands on existing program resources. CHA will explore ways in which a new criteria or policy may be able to assist in addressing temporary income losses due to COVID-19 for currently unassisted Cambridge residents, in a way that is sustainable given program funding.



AUTHORITY

At CHA's meeting of the Board of Commissioners on April 8, 2020 the Board granted authority to the Executive Director, Michael Johnston, to issue revisions to policies without first seeking Board Approval. Additionally, Public and Indian Housing (PIH) Notice 2020-05 issued by HUD on April 10, 2020 provides temporary waiver authority for a number of regulations, including the ability of PHA's to waive 24 CFR § 982.54 (a), allowing PHA's to revise their administrative on a temporary basis without Board approval.

This will also modify any such references to the Emergency Criteria as described in Parts 2 and 3 of CHA's Administrative Plan as well as the ACOP.