



# Memo

**To:** Michael Johnston, Executive Director

**From:** Hannah Bolcome, Director of Leased Housing

**cc:** Brenda Downing, Deputy Executive Director; Kevin Braga, Director of Operations; Karrie Kanavan, Deputy Director of Operations; Yuen Ting Tang-Wu, Deputy Director of Leased Housing; Farita McPherson, Deputy Director of Leased Housing

Sue Cohen, General Counsel; Shayla Simmons, Assistant General Counsel

Leased Housing Department & Operations Department, CHA

**Date:** March 23, 2020

**Re:** Temporary Revisions to Interim Rent Policies for Housing Choice Voucher (“Section 8”) and Low Income Public Housing (including RAD & Former Public Housing) Programs in Response to COVID-19

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In light of the COVID-19 public health emergency, CHA is making temporary revisions to its interim rent policies for all programs.

- Households in which a member or members have had a change in household information or circumstance (i.e. decrease in income, increase in deductible medical or childcare expenses expense, etc.) (from March 1 through May 31) should report their change in income or circumstance via the following form: <https://www.cognitofrms.com/CambridgeHousingAuthority3/InterimRecertificationRequestDueToCOVID19>
- This online form will serve as a self-certification of the change. The form will also allow the client to upload documentation to verify their situation upon initial submission of the form; however, verification/documentation to support the request will not be required immediately if the client does not have it.
- Upon receipt of the online form, CHA will process a provisional rent decrease interim recertification, effective for the first of the month following the date the information was first reported to CHA, and will inform the tenant and landlord of the change.

- The household must provide the appropriate verification documents (i.e. termination letter from employer, pay-stubs or a print-out from the employer to verify the decreased hours, etc.) to CHA within 60 days from the date that the original request was submitted to CHA via the self certification online form. It is recommended that any subsequent documentation be provided via e-mail or fax to ensure timely delivery.
- If verification is not provided within the 60 day timeframe then CHA will void the interim recertification it previously completed based on the self-certification, and the tenant rent will revert back to the original amount before the reported change.

Example: A household member reports that they lost their job on 3/13/20, but does not yet have verification from the employer. CHA will adjust the household's rent according to the member's self-certification of the job loss, effective for 4/1/20. The member will need to submit verification to CHA of the job loss by 5/13/20. If verification is not provided by 5/13/20 then CHA will void the 4/1/20 interim rent recertification and the tenant rent and HAP will revert back to the original amount (before the interim change) retroactive to 4/1/2020, and the household will be responsible for any amounts owed to the landlord.

- CHA is also temporarily revising its policy to verify all household member's income at the time of interim, and in these cases will only be verifying the income of the household member who is reporting the change.

Example: a household has two members, Member A and Member B. At the time of the last regular recertification, only Member A was working. Subsequently, member B started working, but was not required to report this to CHA until the household's next regular recertification. Member A is laid off in March 2020 due to COVID-19, and reports this to CHA. CHA will complete an interim recertification effective for 4/1/20 to remove Member A's income. CHA will not verify or include Member B's new income in the interim recertification for 4/1/20. If Member A subsequently returns to work then they are required to report it to CHA (per CHA's policy on reporting your next rent increase after a interim rent reduction) and their income will be added back in at that time. Member B will not be required to report their income until the next regular recertification.

Staff must make detailed notes in the system so that it does not appear as though income was missed, not verified, or not reported.

- The online self-certification form will have a signature field for the household member, and will contain "general release" language authorizing the CHA to contact third-party sources to verify the information that is being reported, including running EIV reports (although EIV is typically a few months behind).
- Consistent with CHA's regular interim policies, the household will be required to report any subsequent increase in income following an interim rent reduction (i.e. once the household member returns to work they must notify CHA) within 30 days of the change.