



To: THA Housing Authority Staff
From: Michael Mirra, Executive Director
Date: April 16, 2020
Subject: Executive Emergency Authorization #5 Waiving Easing Rent Adjustments and Program Documentation Requirements

Michael Mirra

THA Board Resolution 2020-03-18(1) allows the Executive Director (or his designee) to take emergency actions during the COVID-19 pandemic he deems necessary to ensure continued operations of Tacoma Housing Authority (THA) while protecting employees, clients, vendors, partners and the community.

This Executive Action permits THA to make it easier and faster for clients in some THA programs to request and receive a decrease in their rent to account for their loss of income due to the COVID-19 pandemic.

1. **APPLICABILITY OF THIS EXECUTIVE ACTION**

This Executive Action will benefit only those THA clients who are in programs that require them to report their income to THA directly. It will not benefit others.

1.1 **Programs Covered By This Executive Action**

This action will apply to THA clients who participate in the following programs:

1.1.1 *Tenant Based Rental Assistance Program*

- Housing Choice Vouchers;
- Housing Opportunity Program (HOP);
- Children's Housing Opportunity Program (CHOP);
- College Housing Assistance Program – tenant based (CHAP).

1.1.2 *Public Housing Tenants*

THA has a few remaining public housing tenants.

1.1.3 *Project-Based Voucher Programs*

- THA housing with a THA HAP contract that subsidizes the rents;
- Housing owned by other organizations with a THA HAP contract that subsidizes the rent.

1.2 **Programs **Not** Covered By This Executive Action**

This action will **not** apply to participants in the following programs because they do not report income directly to THA.

- Property Based Subsidies (*e.g.*, Koz on Market, Koz at the Dome, Highland Flats, Cross Pointe, long term care facilities);
- Prairie Oaks (Its tenants report income to Pierce County Housing Authority)
- Alberta Canada Apartments (Its tenants report income to HUD)
- Outrigger and Highland Crest apartments [*NOTE*: This Action would cover tenants in these two properties who have tenant-based assistance that require them to report their income to THA.]

2. MAKING RENT ADJUSTMENTS EASIER FOR COVERED CLIENTS

This Executive Action permits THA to make it easier for covered tenants to request and get rent decreases because of income loss during the COVID-19 pandemic.

2.1 General Changes

- For most of the clients covered by this action, THA’s normal policies require THA to reduce their share of the rent only when they report an income loss greater than 20%. THA will waive the 20% rule and will process changes of any amount.
- THA will waive the 90-day rule that requires losses to last longer than 90 days.
- For purposes of determining eligibility, rent subsidy levels and other elements of the program, THA will waive the requirement for clients to furnish documentation provided by third parties. Such documentation includes government issued identification, Social Security Numbers and documentation of eligibility for unemployment benefits.
- THA will permit clients and tenants to self-certify income loss.
- THA will process monthly HAP adjustments instead of interim rent changes. These will process faster and can be coded directly to Covid-19 expenses.
- Covered fixed subsidy clients usually cannot get rent decreases when their income goes down. Under this Action, they can request and get a rent adjustment down to what the normal rules of the tenant-based voucher program would give them.

2.2 Lookback Period

Rental Assistance and Property Management will look back to changes submitted between 3/16¹ and 3/20 to determine if any changes reported were Coronavirus related and if now eligible households were denied a change.

2.3 Effective Date of an Emergency Coronavirus Hardship Adjustment

Adjustments will adhere to the same schedule for normal change requests. Those submitted before the 20th will be processed for the first of the following month. Those submitted after the 20th will be processed the first of the second month. For example, households that apply in June, before the 20th, will be eligible for a hardship adjustment beginning in July.

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¹ March 16th is the date the Governor shut down restaurants.

2.4 Length of the Hardship Adjustment

Unless THA extends this Action, its permitted rent adjustments will last up to 120 days or until August 31st, whichever comes first. At that time, the rent for clients in fixed subsidy programs will then return to normal levels. At that time, clients in income-based subsidy programs can request a regular interim rent adjustment under the normal rules based upon a longer lasting change in their income. Otherwise, their rent will return to previous levels.

The August 31st end date means that applications received after July 20th will not be eligible for the Emergency Coronavirus Hardship, unless THA extends this Action. Without an extension, staff will process interim adjustments according to regular policy.

This policy change is effective immediately.

Cc: Derek Young, THA Chair