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Navigating PIC and REAC PHAS Reporting and Operational Planning Strategies during the COVID-19 Pandemic

May 14, 2020

Agenda

- COVID-19/CARES Act
 - HUD/PIH Response to coronavirus
 - IMS/PIC Reporting Requirements
 - PHAS Reporting Requirements
 - PASS Physical Inspections
 - FASS Financial Submissions
 - Personally Identifiable Information/Privacy Issues
 - Remote Video Inspections (RVI)
 - Quick-Guide Planning for PHAs & Toolkits
 - Questions



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The CARES Act

- The President signed the Coronavirus Aid, Relief, and Economic Security (CARES) Act, into law on March 27, 2020
 - Provides broad waiver authority and flexibilities, to allow PIH and our partners to continue the mission of providing decent, safe, and affordable housing
 - Provides additional funding to HUD to prevent, prepare for, and respond to the national impacts of the coronavirus pandemic

PIH CARES Act Response

- PIH Resources for PHAs in response to coronavirus
 - Published 4 sets of [FAQs](#) to provide guidance on coronavirus-related issues.
 - Published [guidance](#) on eviction moratorium from the CARES Act.
 - Published Notice [PIH 2020-05](#) waiving and establishing alternative requirements for numerous statutory and regulatory requirements for HCV and PH.
 - Published Notice PIH [2020-07](#) to provide guidance on allocation and uses of CARES Act supplemental Operating Funds totaling \$685 million.
 - Published Notice PIH [2020-08](#) to provide guidance on the calculation and uses of CARES Act supplemental HCV and Mainstream Programs Administrative Fees totaling \$380 million.
 - Created dedicated mailboxes to respond to waiver related questions PIH-covidwaivers@hud.gov and general questions PIH-COVID@hud.gov
- For more information, go to <https://www.hud.gov/coronavirus>



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IMS/PIC Reporting

IMS/PIC – Reporting

IMS/PIC is used by PIH and HUD to collect vital tenant and building data for funding and program oversight that enables:

- The effective calculation of Operating and Capital Fund allocations for more than 2,800 PHAs
- The upcoming validation of Housing Choice Voucher funding allocations to approximately 2,200 PHAs nationwide
- Preventing abuses in assisted housing programs by providing timely income and wage data to PHAs during annual income recertifications through the EIV system
- Providing information needed to conduct physical inspections nationwide
- Program evaluation and design including trending and characteristics of our low-income population
- PIH cannot stress enough the importance of submitting your 50058 in a timely manner, as this information supports the ongoing operation and funding of many HUD rental housing assistance programs.



Extension of Time to Submit – IMS/PIC 50058

Waiver Summary	References	Page Number
<ul style="list-style-type: none">• HUD is extending the time period PHAs must submit HUD Form 50058 transactions to PIC from 60 days to 90 days• Drivers for 50058 submission:<ul style="list-style-type: none">• Annual reexaminations• Initial intake of families (move-in)• Changes of family composition & interim reexaminations	<ul style="list-style-type: none">• Regulatory Authority: 24 CFR Part 908, § 982.158• Sub-regulatory Guidance: PIH Notice 2011-65	28

PHA Waiver Notice and Reporting

- There will be some impacts to Form-50058 reporting in PIC resulting from the adoption of waivers included in [Notice PIH 2020-05](#)
- PHAs that adopt some waivers will need to make adjustments to prevent receiving fatal errors
- The Period of Availability ends on 12/31/2020
- PHAs need to be aware that over 7-8 million 50058 submissions are received every year and falling behind may pose severe operational issues down the road



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50058 Reporting – HQS Inspections

- **HQS inspections (*waiver notice provisions HQS-1, HQS-2, HQS-3*):**
- For New Admissions where the PHA does not have a date to enter on line 5h, “Date unit last passed HQS inspection”, and/or line 5i, “Date of last annual HQS inspection”, they will enter 01/01/1900. For MTW PHAs, leave both lines blank when using the Form-50058 MTW.
- **HQS inspections (*waiver notice provisions HQS-4, HQS-5*):**
- For other action types where a date has previously been entered in lines 5h and 5i, those existing dates can be left in until a new date is available.



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50058 Reporting – CSSR

- **Community Service and Self-Sufficiency Requirement (CSSR) (*waiver notice provision PH-4*)**
- Due to the temporary suspension of CSSR, PHAs should enter 3, Pending, for all household members unless they are exempt, in which case the PHA would enter 4, Exempt, as they usually would. Update this entry at the next annual reexamination based on the resident's compliance.



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50058 Reporting – Reporting Delays

- **Delay in submitting Form-50058s (*waiver notice provision 12a*):**
- For Form-50058 submissions, there is currently a warning error in IMS-PIC that is presented if a Form-50058 is more than four months since it was last modified in the vendor software
- There is a similar error for Form-50058 MTW submissions that says three months.
- **Because of this, it is recommended that PHAs start, finish, and transmit 50058s within these timeframes.**
- If this is not possible, be aware that the applicable warning error will be shown upon submission to PIC, but that the 50058 will be submitted if there are no fatal errors present.



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IMS/PIC Upgrade

- Recently, the IMS/PIC system was upgraded to align with industry best practices for security and data integrity and inventory Removals applications and the ability to replace IDs in Tenant ID Management .
- The primary business process that is impacted by the upgrade is the processing of applications to remove public housing building and units from the IMS/PIC inventory module.
- PIH has provided detailed information about the IMS/PIC issues at: https://www.hud.gov/program_offices/public_indian_housing/systems/pic
- If you have questions, or need assistance, please contact the Technical Assistant Center by email: REAC_TAC@hud.gov.



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PHAS Reporting & Scoring



PHAS Scoring

Waiver Summary	References	2020-05 Page Number
<ul style="list-style-type: none">• Per PIH Notice 2020-05, effective 04/12/2020, REAC is waiving HUD requirements under 24 CFR Part 902 to issue PHAS scores through 12/31/2020, unless a PHA requests a new PHAS score release.• HUD will begin re-scoring PHAs with fiscal years ending 3/31/21 and thereafter	<ul style="list-style-type: none">• Section 5A(a)(1), Section 5A(b)(1), Section 5A(g), Section 5A(h) of 1937 United States Housing Act (USHA)• 24 CFR § § 903.5(a)(3), 903.5(b)(3), 903.21	27-28



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PHAS - Scoring

- The suspension of physical inspections, until further notice, will have an impact on HUD's ability to produce PASS scores.
- HUD will carry forward the most recently published Public Housing Assessment System (PHAS) scores through 12/31/2020 unless the PHA requests that a new score be issued.
- REAC will inspect PHA properties using risk-based criteria to ensure the health and safety of residents; however, physical assessment scores will be advisory only, unless otherwise requested by the PHA.



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PHAS Score & Other Info

- **If a PHA would like to request a PHAS score that would not otherwise be issued due to the waiver, it should e-mail the request to PHAS@hud.gov and copy the local PIH Field Office.** There are no other special requirements.
- **Timeframe and deadline for requesting new PHAS scores:** REAC is determining the timeframe and deadlines for PHAs requesting new PHAS scores for new physical inspections. The final date has not been finalized.
- **Deregulation Years:** In the event the most recent published score was a deregulation year, the last designation that was released prior to the designation of “SPD” (Small PHA Deregulation) carries forward.



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Physical Assessments – Scoring

- Pending PASS Scores for FY 2018 and FY 2019 (those with no prior release) will be advisory, unless a PHA requests a new PHAS score release and, in that case, the FY 2020 score will be released for FY 2020 and the prior year(s).
- As we restart inspections, PHA properties that have not been assessed in the last three years and properties with no scores will be prioritized.
- New physical assessments and PASS Scoring will resume for PHAs with fiscal years ending 3/31/2021



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Physical Assessments – Procedures

- REAC will notify PHAs at least 30 days prior to the resumption of inspections to allow PHAs the opportunity to normalize business operations.
- HUD's 14-Day Notification Policy will be in effect once inspections resume. REAC inspections on public housing developments, including RAD developments, will proceed if occupied, without exception.
- Scheduling is contingent upon the contractor's schedule and local restrictions due to COVID-19.



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Physical Assessments – COVID-19 Special Procedures

- HUD will require contractors to wear face masks and gloves and use hand sanitizer, at a minimum, when conducting inspections.
- POAs are responsible for communicating local restrictions relating to COVID-19 to the contractor/inspector at the time the inspection is scheduled.
- HUD will determine if the inspection should be cancelled due to local restrictions or reported COVID-19 cases at the with guidance from the Field Office.



FASS-PH Reporting Waivers

Waiver Summary			Page Number
Extension for submission of audited and unaudited financial statements			30
FYE	Due Date	Extended Due Date	
Audited			
6/30/2019	3/31/2020	9/30/2020	
9/30/2019	6/30/2020	12/31/2020	
12/31/2019	9/30/2020	3/31/2021	
3/31/2020	12/31/2020	6/20/2021	
Unaudited			
12/31/2019	2/29/2020	8/31/2020	
3/31/2020	5/31/2020	11/30/2020	



FASS-PH Rejection Review

Waiver Summary	Page Number
<p>PHAs with rejected FDS submissions may need to resubmit the FDS</p> <div data-bbox="331 651 1854 1122"><p>Rejected submissions not covered by PIH Notice 2020-05: 45 days to resubmit</p><ul style="list-style-type: none">• Rejected: Audited 12/31/2018• Resubmit corrected financial data within 45 days from the date of rejection.• Contact (analyst name) for questions<p>Rejected submissions covered by PIH Notice 2020-05: Refer to extended due dates</p><ul style="list-style-type: none">• Rejected: Audited 06/30/2019• Resubmit corrected financial (refer to extended due date in PIH Notice 2020-05).• Contact (analyst name) for questions</div>	28



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EIV Use and Reporting



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Reporting Waivers

Waiver Summary	Page Number
HUD is waiving the mandatory EIV monitoring requirements through July 31, 2020. However, PHAs should download the monthly and quarterly reports as the data in EIV is not stored but overwritten.	10
HUD will revisit the timeline of when EIV monitoring requirements will restart based on conditions on the ground.	10



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PH and HCV - Annual Reexaminations

Waiver Summary	References	Page Number
<ul style="list-style-type: none">• PHAs may continue to conduct on-time annual reexaminations by opting to streamline income verification requirements through 7/31/20<ul style="list-style-type: none">• PHAs may consider self-certification the highest form of income verification• Verification could occur over phone, through an encrypted email with a self-certification form by the family, or through other encrypted electronic communications	<ul style="list-style-type: none">• 24 CFR § 5.233(a)(2),• PIH Notice 2018-18	8



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PH and HCV - Interim Examinations

Waiver Summary	References	Page Number
<p>Through 7/31/20, PHAs may consider self-certification as the highest form of income verification to process interim reexaminations.</p> <ul style="list-style-type: none">• PHAs may consider self-certification the highest form of income verification• Verification could occur over phone, through an encrypted email with a self-certification form by the family, or through other encrypted electronic communications	<ul style="list-style-type: none">• Section 3(a)(1) of the USHA of 1937• 24 CFR § 982.516(c)(2) § 960.257(b) and (d) § 5.233(a)(2),• PIH Notice 2018-18	<p>9</p>



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Handling Personally Identifiable Information (PII)

- **What is PII?:** Information which can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information directly linked or linkable to a specific individual. Examples of PII include: name, social security number, biometric records, date and place of birth, mother's maiden name, etc.
- **Privacy & Telework:** Please remember, during telework there are risks to privacy and information security that are inherent with a remote workstation. The PHA is committed to minimizing the risk of exposure or misuse of the data we collect, use, and share to achieve our mission – especially individuals' PII. It is the duty of the PHA employee to safeguard sensitive information, including all PII at all times.



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Handling Personally Identifiable Information (PII)

- Additional Reminders:
 - Staff should use PHA-issued laptops;
 - PII should be protected at all times and properly secured (see PIH Notice 2015-06)
 - Encrypt all files with PII and have password protection for documents
 - Any documents containing PII should be encrypted and sent to the employee's PHA e-mail address and not a personal e-mail address
 - Documents should not be downloaded to the employee's personal computer
- PHA employees should work with their supervisors to determine what types of documents are appropriate to take home and what documents must stay secured within the PHA workspace



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PII & Information Security- FAQs

- Responsibility for safeguarding personally identifiable information collected from residents rests with PHAs.
- For purposes of delivering COVID-19 services (e.g. wellness checks, delivery of medicine), to the extent a PHA has a legally enforceable contract with the service provider to safeguard that information in accordance with PIH Notice 2015-06, the Department believes this is an effective way to deliver assistance (similar to HQS inspections).
- Where such enforceable agreement does not exist, to expedite access to critical COVID-19-related services such as food delivery and/or medical supplies, PHAs should provide residents with a contact list of its local social service providers. Residents can provide their PII directly to the chosen service providers.
- This method of service delivery eliminates the need for PHAs to share resident PII contained in IMS/PIC and the Enterprise Income Verification systems.



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PII & Information Security- Privacy Act

- HUD does not have the authority to amend the Privacy Act of 1974, as amended, 5 U.S.C. § 552a, that governs the collection, maintenance, routine use, and dissemination of information about individuals that is maintained in systems of records by federal agencies.
- Consistent with the Privacy Act, HUD cannot use its existing regulatory authority to identify “routine uses” of PII information sharing related to the COVID-19 response that would not require written consent from residents.
- It is the PHA’s responsibility to protect residents’ PII for purposes of delivering COVID-19 assistance.



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Remote Video Inspections (RVI)



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HQS –

Remote Video Inspections

- The following tools and supporting regulations can be used in conjunction with remote video inspections (RVI) to provide PHAs flexibility in adverse situations, such as the COVID-19 pandemic, or when in-person inspections are not feasible.
 - Biennial inspections- 24 CFR 982.405 and Notice PIH 2016-05
 - HOTMA – Initial inspections move in if no life-threatening deficiencies- Notice PIH 2017-20
 - HOTMA – alternative inspections- Notice PIH 2017-20
 - NOTICE PIH 2020-05- Notice PIH 2020-05
- RVI will be an additional tool at PHAs' disposal that may provide added flexibility in their HCV program, maximize resources and aid in housing families during the pandemic.
- RVI allows the PHAs to continue to perform HQS inspections in lieu of some of the above flexibilities could cause a backlog on inspections, which must be completed later.



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HQS – What is RVI?

- Remote Video Inspection (RVI) is a regular HQS inspection preformed remotely with a “proxy” inspector with the PHA HQS inspector remotely directing the inspection.
- Conducting a RVI does not change the current HQS requirements, Lead Based Paint (LBP) requirements or any additional criteria adopted by the PHA; it is simply an alternative method of conducting a HQS inspection.
- RVI would give PHAs the flexibility to use an alternate inspection method to fulfill the HQS inspection requirements, without compromising the health and safety of the individuals by allowing for social distancing.



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HQS –

How does a PHA use RVI?

- HUD PIH Notice 2020-05 has waived the Administrative Plan and Annual Plan requirements so this is all that is required to get RVI up and running.
- The PHA needs to notify REAC they are instituting the RVI for tracking purposes
- HUD will post a best practices document and send a link in a subsequent Q&A
- For more information, e-mail Kevin Laviano at: Kevin.Laviano@hud.gov

Questions

- **IMS/PIC Reporting:** IMS-PICManagement@hud.gov
- **PHAS:** PHAS@hud.gov
- **Inspections:** Brian.Ruth@hud.gov
- **FASS:** Contact your FASS analyst via e-mail
- **EIV:** Rochelle.Katz@hud.gov
- **RVI:** Kevin.Laviano@hud.gov
- **All other questions, contact the Technical Assistance Center:** REAC_TAC@hud.gov



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COVID-19 Toolkits

- Quick-Guide Planning**
- Safe Distribution/Distancing**

Quick Guide Purpose

The purpose of this Quick Guide is to provide you with ideas and information to consider as you develop strategies to address the impact of the pandemic on your public housing authority (PHA).

When creating a plan to manage coronavirus impacts, PHAs should consult:

- Local and State health departments
- Local and State emergency management agencies
- Local and State governments
- Local and State disability and aging organizations

Contents of the Quick Guide

Included in the guide are:

- Useful online links to obtain the latest official information
- Planning considerations
 - PHA leaders should carefully and continually assess changing conditions. This section provides you guidance as you face new directives emerging daily.
- Ways to address:
 - Business and operational impact,
 - Impact on people,
 - Policy adjustment or creation, and
 - Communications to consider

More Content...

The guide also provides you with:

- Guidance on coordinating with external organizations.
 - We are all in this together. Reaching out to Federal, State, and local public health agencies is critical.
- Lastly, post-pandemic recovery.
 - Once the pandemic has subsided, extensive ongoing planning will be necessary to ensure you return to normal operations. Suggestions are given to help guide you through this work.



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Safe Distribution and Social Distancing Toolkit

- **Our Charge:** To provide guidance to HUD housing partners, to include PHAs, TDHEs, HUD field/regional offices, and housing advocates on [safe distribution and social distancing promising practices](#) compliant with Center for Disease Control guidelines.
- **The Results:** A collection of resources in the form of a [toolkit](#) that housing partners may use to prevent and reduce the spread of COVID-19.

Toolkit Contents

- COVID-19 Interaction [Playbook](#) for Housing Partners
- COVID-19 Guidance [Flyer](#) for Housing Partners
- Coronavirus Prevention [Flyer](#) for HUD Residents