

Evaluation of the **PHA CARES Waivers**

Final Comprehensive Report



PD&R



DISCLAIMER

The contents of this report represent the views of the contractor. They do not necessarily reflect the views or policies of the U.S. Department of Housing and Urban Development or the U.S. Government.

The National Association of Housing and Redevelopment Officials (NAHRO) provided subject matter expertise for this study and a review of this report. NAHRO is a membership organization of more than 26,000 housing and community development providers and professionals throughout the United States. Their work includes the advocacy of housing policy—including policy impacting Public Housing Agencies (PHAs)—with federal agencies and Congress. To prevent perceived conflicts of interest and protect the integrity of this study, NAHRO was not involved in selecting PHA sites and did not contact or engage study participants on matters related to this study.

Final Comprehensive Report

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Table of Contents

List of Exhibits.....	v
Executive Summary	vii
Conclusion.....	xii
Chapter 1. Introduction	1
1.1 Study Objectives and Research Questions.....	2
1.2 Organization of the Report	4
Chapter 2. Background on the CARES Act Waivers	5
2.1 Overview and Timeline of Waivers	5
2.2 Pre-CARES Act Regulatory Waiver Requests Granted to PHAs.....	7
2.3 Summary of Waivers Offered with Authority from the CARES Act.....	9
2.4 HUD Guidance on Waiver Implementation and Expiration.....	14
2.5 Tracking Waiver Implementation	15
2.6 Post-CARES Act Waivers and Flexibilities	16
2.7 Regulatory Waiver Requested and Granted Post-CARES Act.....	19
Chapter 3. Study Design and Methodology	22
3.1 Document Review	22
3.2 CARES Act Waiver Reporting Tool Survey Data Analysis	23
3.3 Interviews with PHAs	24
3.4 Additional HUD Administrative Data Analysis	28
Chapter 4. Study Findings.....	30
4.1 Objective 1: Understanding the Implementation of CARES Act Waivers	30

4.2 Objective 2: Identify Trends and Characteristics Among PHAs.....	37
4.3 Objective 3: Document Outcomes Resulting from Implementing CARES Act Waivers.....	50
4.4 Objective 4: Explore Future Policy and Program Implications.....	62
Chapter 5. Conclusion	72
5.1 Key Study Findings	72
5.2 Limitations of the Study and Areas for Future Research.....	74
Appendix A. Research Questions and Participating Public Housing Agencies (PHAs).....	76
Appendix B. Sample Development	81
Sampling Frame	81
Sample.....	81
Sampling Approach for PHAs that Adopted at Least One CARES Act Waiver	83
Sampling Approach for PHAs that did not Utilize any CARES Act Waivers	85
Appendix C. Data Collection Instruments	86
Leadership Interview Protocol for PHAs that Adopted a Waiver	86
Operation Staff Interview Protocol for PHAs that Adopted a Waiver.....	90
Resident Advisory Board or Resident Interview Protocol for PHAs that Adopted a Waiver	93
Leadership Interview Protocol for PHAs that did not Adopt a Waiver.....	97
Appendix D. Supplemental Tables	99
Appendix E. Results from the Exploratory Analysis of Administrative Data	111
Description of HUD’s HCV Dashboard Data.....	111
HUD’s Financial Data Schedule (FDS)	111
Quantitative Data Analysis Methodology.....	112

Propensity Score Matching112

Difference-in-Difference Analysis.....112

Quantitative Data Analysis Results.....113

Tenant Accounts Receivable (TAR).....113

References115

List of Exhibits

Exhibit 2.1 Timeline of Regulations and Notices Impacting Waivers	7
Exhibit 2.2 Pre-Cares Act HUD Waivers Granted in 2018 and 2019	9
Exhibit 2.3 CARES Act Waiver and Flexibility Notices	10
Exhibit 2.4 Waivers Offered by the Coronavirus Aid, Relief, and Economic Security (CARES) Act by Type.....	11
Exhibit 2.5 HUD Guidance on Navigating CARES Act Waiver Expiration	15
Exhibit 2.6 Waivers Granted to Public Housing Agencies (PHAs) in 2021 and 2022	20
Exhibit 2.7 Expedited or Streamlined Waivers Granted to Public Housing Agencies (PHAs) in Q1–Q3 of 2022.....	21
Exhibit 3.1 Document Search Sources	23
Exhibit 3.2 Variables Used in Logistic Regression.....	24
Exhibit 3.3 Geographical Location of Sampled Public Housing Agencies (PHAs).....	26
Exhibit 3.4 Sections Comprising the Semi-Structured Master Interview Guide	26
Exhibit 3.5 List of Interview Respondent Groups	27
Exhibit 4.1 Public Housing Agencies (PHA)-Reported Pandemic Challenges (n = 40)	32
Exhibit 4.2 Considerations for Adopting Waivers (n = 50)	34
Exhibit 4.3 Most Adopted Waivers by Type	39
Exhibit 4.4 Least Adopted Waivers by Type	41
Exhibit 4.5 Waiver Adoption by Moving to Work (MTV) Status.....	44
Exhibit 4.6 Public Housing Agencies (PHAs)' Adoption of CARES Act Waivers by Region	46
Exhibit 4.7 Public Housing Agencies (PHAs)' Adoption of CARES Act Waivers by Size .	47

Exhibit 4.8 Adoption of CARES Act Waivers by Program Type	47
Exhibit 4.9 PHAs' Adoption of CARES Act Waivers by Moving to Work Status	48
Exhibit 4.10 PHA Characteristics that Influence the Adoption of CARES Act Waivers..	48
Exhibit 4.11 Waiver Adoption Rates Among Interviewed PHAs	52
Exhibit 4.12 Number of PHAs that Discussed Outcomes of Waivers	56
Exhibit 4.13 Number of PHAs from the Sample that Adopted Expedited Waivers	61
Exhibit 4.14 Waivers PHAs Want to Be Continued.....	63
Exhibit A.1 Research Questions Addressed in the Final Report and Associated Data Sources	77
Exhibit A.2 List of Interviewed Public Housing Agencies (PHAs)	79
Exhibit B.1 Criteria for Sampling PHAs that Adopted at Least One Waiver	83
Exhibit B.2 Sampling Approach for PHAs that Adopted at Least One CARES Act Waiver	84
Exhibit B.3 Sampling Approach for PHAs That Did Not Adopt CARES Act Waivers	85
Exhibit D.1 Waiver Adoption Rate by Waiver Categories	99
Exhibit D.2 Waiver Adoption Rate by Moving To Work (MTW) Status	105
Exhibit E.1 Difference-in-Differences Estimation for Voucher Utilization.....	113
Exhibit E.2 Difference-in-Differences (DID) Estimation for Budget Utilization.....	113
Exhibit E.3 Difference-in-Differences (DID) Estimation for Tenant Accounts Receivable	114

Executive Summary

In March 2020, the COVID-19 pandemic severely disrupted the operations of public housing agencies (PHAs), creating conflicts between public health directives and HUD regulations, such as meeting the requirement for in-person meetings and inspections while maintaining ongoing social distancing measures. To address these challenges, Congress granted HUD the authority to issue statutory waivers through the Coronavirus Aid, Relief, and Economic Security (CARES) Act, enabling PHAs to adapt their operations to serve low-income families while adhering to social distancing guidelines.

Through a series of notices, HUD's Office of Public and Indian Housing (PIH) offered statutory waivers authorized by the CARES Act combined with regulatory waivers and flexibilities to continue and improve PHA operations during the pandemic. These notices enabled PHAs to immediately implement waivers at their discretion, bypassing the typical HUD review and approval process used for waivers. As the waivers under the CARES Act neared expiration, HUD offered a new set of regulatory waivers, referred to as *expedited waivers*, which extended some of the regulatory waivers included in the PIH notices responding to the CARES Act. These expedited waivers did not completely bypass the HUD review and approval process but were met with a faster review than regulatory waivers available before the CARES Act.

In September 2022, HUD contracted 2M Research, an independent research firm, to conduct a study of the waivers made available by HUD under the authority of the CARES Act, along with the regulatory waivers and flexibilities offered around the same period. The objectives of this study were—

- Objective 1 To understand ***how HUD and PHAs implemented CARES Act waivers.***
- Objective 2 To identify ***trends and characteristics of waiver implementation.***
- Objective 3 To document ***outcomes of waiver implementation***, including related strengths and challenges experienced by PHA leadership, staff, and residents.
- Objective 4 To explore ***future policy and program implications of CARES Act waivers.***

To address the study's objectives, the researchers employed a mixed methods approach comprising four main components—

- **Document Review:** The researchers examined HUD documents and reports to understand the background, authorization, and implementation of the CARES Act waivers.
- **CARES Act Waiver Reporting Tool (CAWRT) Data Analysis:** PHAs reported information to HUD about the waivers and flexibilities they implemented through HUD's CAWRT reporting tool. The researchers tabulated this data to identify the most and least adopted waivers and the characteristics of PHAs that implemented or declined the waivers.

- **Semi-Structured Interviews with PHA Stakeholders:** The researchers interviewed PHA stakeholders, including leadership, operations staff, and residents from 53 PHAs that adopted at least one waiver and 6 PHAs that chose not to adopt any waivers. From these stakeholders, the team gathered qualitative insights into the outcomes of the waivers on PHA operations and assisted households.
- **HUD Administrative Data Analysis:** The researchers analyzed HUD administrative data to assess the influence of waiver adoption on PHA service quality and performance metrics.

Key findings are organized within the four study objectives as follows—

Objective 1: Implementation of CARES Act Waivers

Initial Pandemic Challenges: Due to safety concerns and social distancing, more than one-half of interviewed PHAs initially struggled to shift from face-to-face operations to virtual formats. This transition impacted voucher briefings, maintenance, inspections, and collection of eligibility documentation. Maintenance and inspections were particularly challenging for PHAs because these tasks did not convert well to virtual operations. Many PHAs also faced increased staff workloads due to tenant income reductions, resulting in increased recertifications and staffing shortages from retirements. Local mandates and eviction moratoriums further strained PHA finances due to non-payment of rent.

Impact of the CARES Act Authorization on Waiver Implementation: The removal of HUD’s review and approval process facilitated faster and easier waiver adoption. Prior to the CARES Act, two-thirds of interviewed PHAs had not adopted previously available regulatory waivers due to a lack of need at the time, a burdensome application process, and a lack of knowledge regarding the availability of waivers. The CARES Act improved PHA knowledge of waiver options for those who had not previously known about their availability.

Process for Implementing and Tracking CARES Act Waivers: Most PHAs reviewed waiver options with their staff, decided which to implement, and then went to their boards for approval, although HUD did not require this last step. Nearly one-half of the interviewed PHAs reviewed waivers with external stakeholders such as Resident Advisory Boards, other PHAs, field offices, and industry associations. The main considerations for implementing waivers were health and safety, uncertainty about future regulations, and compliance with HUD policies after the expiration of the waivers. PHAs tracked the waivers through internal documents, and an attachment was provided on the first PIH Notice 2020–05.¹ Some PHAs reported struggling with changing waiver expiration dates despite their efforts to track waivers.

¹ The attachment included in PIH Notice 2020-05 provided a summary of public housing and Housing Choice Voucher (HCV) waivers and alternative requirements. The summary includes two columns PHAs could use to track their adopted waivers and effective dates.

HUD Guidance and Support: PHAs received guidance from HUD through various PIH notices, HUD’s website, and conferences held by HUD and regional offices. Additional support came from national organizations such as the National Association of Housing and Redevelopment Officials (NAHRO), state housing authority associations, and the Public Housing Authorities Directors Association (PHADA). PHAs from different regional offices had varying levels of satisfaction with HUD guidance. Some PHAs sought more pragmatic, shorter, and clearer guidance, often turning to other PHAs and industry organizations for additional support.

Waiver Implementation Challenges: PHAs reported challenges during the implementation of the waivers, which included adopting new technology, tenants struggling with using technology, and concerns about inaccurate income reporting. Overall, PHAs noted that ongoing pandemic challenges were more significant than the challenges of implementing waivers.

Objective 2: Trends and Characteristics of Waiver Implementation

Analysis of CAWRT survey data indicates that waiver adoption rates varied among PHAs. The Housing Quality Standards (HQS) Quality Control Inspection, PHA Oral Briefing, Term of Voucher: Extensions of Term, and Initial Inspections Requirements were the most adopted waivers, each with adoption rates of more than 65 percent. Conversely, waivers from the Moderate Rehabilitation (Mod Rehab) Program and Mainstream Voucher program categories had consistently low adoption rates, each below 8 percent. Mod Rehab and Mainstream voucher programs are less commonly run programs across PHAs.

Adoption of waivers was also associated with PHA characteristics such as geographic region, PHA size, Moving to Work (MTW) status, and program types. For example—

- Waiver adoption rates in the Far West & Beyond² were the highest (85 percent) and the lowest in the Southwest (31 percent).
- Larger (91 percent) and medium-sized (79 percent) PHAs were more likely to adopt waivers than smaller PHAs (38 percent).
- MTW PHAs generally had higher adoption rates when compared with non-MTW PHAs.
- Nearly 7 in 10 PHAs administering only the HCV program adopted waivers, whereas only one-fourth of public housing-only PHAs adopted waivers.

Based on interviews with six leaders from PHAs, the main reasons for declining waivers included the following—

Timing of Guidance: The first waiver notice came out on April 10, 2020, 2 weeks after the CARES Act was passed and 4 weeks after the President declared COVID-19 a national

² This term refers to a region that comprises HUD Regions 9 and 10, covering Arizona, California, Hawaii, Nevada, Alaska, Idaho, Oregon, and Washington.

emergency, which led states to implement shutdowns. PHAs reported needing to adapt immediately. In the month between shutdowns and the issuance of the first waiver notice, three PHAs established alternative processes and, as a result, reported that they did not need the waivers.

Receiving Additional Funding: Three PHAs received pandemic-related grant funding from their local governments to enhance their services. For example, one PHA used this funding to implement broadband for their residents. The availability of Wi-Fi for all residents ensured the PHA had a way to communicate with residents and could continue operations like processing paperwork virtually. The funding, therefore, allowed them to continue their operations without interruption.

Concerns About the Impact on Essential Services: Three PHAs expressed concerns that implementing the waivers could negatively impact the quality of essential services, such as inspections and maintenance of units. These PHAs, therefore, declined to adopt the waivers.

Perceived Burden of Waivers: Two PHAs worried that when waivers expired, HUD would require all deferred compliance requirements—such as inspections, reporting, and other administrative tasks that had been postponed due to the waivers—to be completed at once, making it difficult for their staff to maintain compliance later. Paperwork burden was a concern of one PHA, based on their experience with waivers prior to the CARES Act. A subject matter expert from NAHRO³ provided additional context, noting that in their discussions with PHAs, language in PIH Notice 2020-05 caused concern among some PHAs that there would be future reporting requirements. Although these concerns were significant, the actual reporting requirements were not as substantial as anticipated by these PHAs.

PHA Size: Two PHAs felt their agencies were too small for the waivers to be useful. One PHA leader felt they did not have the staff necessary to review the waivers because those staff had to be involved in day-to-day operations. The other PHA leader felt the number of vouchers they had was manageable to maintain using standard operations but stated that they would have used more vouchers if they had had them.

Objective 3: Outcomes of Waiver Implementation

The researchers first identified the waivers PHAs found most and least useful. Interviews with PHA stakeholders revealed that the CARES Act waivers had mixed (positive and negative) outcomes for PHA operations and HUD-assisted residents, highlighting the

³ NAHRO is a membership organization of more than 26,000 housing and community development providers and professionals throughout the United States whose mission is to “advance the creation of strong, sustainable, and affordable communities through advocacy, professional development, and empowerment of our diverse members.” NAHRO provided subject matter expertise for this study and a review of this report.

intended flexibility and support and the challenges. Understanding these dual effects is crucial for informing future policy and waiver implementation strategies.

Positive Outcomes for PHA Operations and Residents

Operational Continuity and Compliance: Waivers enabled PHAs to maintain essential services, ensuring stability for assisted households during uncertain times. For example, the Income Verification waiver allowed PHAs to expedite processes, facilitating faster assistance for households lacking documentation.

Innovation and Streamlined Practices: Adopting virtual tools like remote inspections and online briefings improved operational efficiency, allowing staff to focus more on tenant needs and program enhancements. Although HUD considered remote video inspections to be flexibilities and not actual waivers, many PHAs identified them in the context of “useful waivers,” as they were offered in PIH notices around the same time during the pandemic as the statutory and regulatory waivers. PHAs also reported positively on streamlined income verification processes that reduced administrative burdens and facilitated faster assistance for households lacking documentation.

Enhanced Customer Service and Landlord Engagement: Virtual engagements, including remote video inspections and online briefings, improved communication and collaboration among PHAs, tenants, and landlords. These waivers led to better customer service and increased landlord participation. The flexibility of accepting electronic documents and conducting remote briefings helped overcome tenant barriers such as transportation issues, thus boosting tenant participation and satisfaction. Furthermore, waivers facilitated stronger relationships with landlords by streamlining processes like inspections and the Housing Assistance Payments (HAP) contracts, thus enhancing cooperation and housing stability.

Negative Outcomes for PHA Operations and Residents

Inequitable Technological Access: Limited access to technology among some residents hindered their ability to fully participate in virtual briefings and inspections,⁴ potentially exacerbating inequalities in service delivery.

Reduced Housing Quality Standards: Some PHAs expressed concerns regarding the HQS Quality Control Inspection waivers due to instances where landlords self-certified units and at least one PHA reported later finding issues like roach infestation and hazards resulting from hoarding. This issue raised concerns about tenant safety and the effectiveness of self-certification.

⁴ Virtual briefings and inspections are flexibilities available to PHAs outside of the CARES Act waivers but were commonly referenced when discussing the negative impacts of waivers.

Inaccurate Self-Reporting: Some PHAs expressed concerns that continuing the waivers that allowed for self-certification of income may not provide a reliable method for verifying income, potentially leading to inaccuracies or deliberate misreporting.

Challenges After Waiver Expiration: Many PHAs faced backlogs after waivers expired. Others experienced difficulty returning to pre-pandemic operations after waiver expirations. Some PHAs also expressed concerns regarding the expiration of the Increase in Payment Standard During the HAP Contract Term and Voucher Tenancy: New Payment Standard Amount waivers. The expiration of these waivers could lead to increased rent burdens on tenants, potentially affecting their housing stability and ability to afford other basic needs.⁵

Objective 4: Explore Future Policy and Program Implications

Expedited Regulatory Waivers as a Continuation of CARES Act Waivers: Approximately one in five PHAs supported expedited regulatory waivers as a continuation of the CARES Act waivers. However, continuing the statutory waivers offered under the CARES Act would require Congress to grant HUD-specific waiver authority. Staff appreciated the flexibility and efficiency the expedited regulatory waivers provided, although some PHAs noted that a lack of awareness or understanding hindered their ability to use them effectively.

Suggestions to Improve Processes for Regulatory Waivers: Nearly one-fourth of the PHAs suggested improvements to HUD's processes for implementing regulatory waivers. Common recommendations included simplifying the waiver process, tailoring flexibilities for small and rural PHAs, streamlining communication, and empowering local field offices to approve waiver requests and provide detailed information to PHAs.

Recommended Additional Waivers to Improve Flexibilities: PHAs recommended additional waivers to further enhance their operations and support their residents. Suggestions included allowing more flexibility in income verification and interim certifications, reducing the frequency of annual recertifications, increasing project-based voucher caps, providing waivers for HUD-Veterans Affairs Supportive Housing (HUD-VASH) vouchers, and allowing online documentation and rent payments. These recommendations aim to streamline processes, reduce administrative burdens, and improve service delivery for residents. HUD has already begun implementing some of these suggestions through recent rule changes and proposed regulations.

Conclusion

The CARES Act waivers played a crucial role in helping PHAs navigate operational challenges, ensure housing stability, and enhance efficiency during the pandemic. Above all,

⁵ The recently finalized Housing Opportunity Through Modernization Act of 2016 (HOTMA) rule addresses these initial rent burden fears by continuing some payment standard flexibilities and providing tenants with ongoing support in managing their housing costs.

the report's findings show that most PHAs thought the CARES Act waivers were useful, often going beyond responding to pandemic challenges. For example, virtual engagement through remote inspection and online briefings improved communications with the tenants and reduced staff workload. PHAs also support continuing these waivers through a simplified waiver process. Although the waivers brought significant benefits, some challenges and suggestions for improvement emerged from interviews with PHA staff.

Chapter 1. Introduction

The mission of the U.S. Department of Housing and Urban Development (HUD) is to create strong, sustainable, inclusive communities and quality, affordable homes for all (HUD, n.d.-a). To advance this mission, HUD funds public housing agencies (PHAs) to administer programs such as the Housing Choice Voucher (HCV) and public housing programs. HUD regulates PHA operations, including eligibility requirements, housing inspections, and occupancy policies.

In March 2020, the COVID-19 pandemic severely impacted HCV and public housing program operations. PHAs complied with directives from public health professionals to slow the spread of COVID-19. However, these directives often conflicted with PHA operations and related statutes and regulations. Social distancing, for example, prevented PHA staff from meeting with tenants in person for unit inspections. Other challenges included difficulties accessing important documents and information from residents for program enrollment and verifying income and employment.

In response to the pandemic-related challenges PHAs faced, HUD published a series of notices that allowed PHAs to waive or use alternative requirements to administer their programs. These flexibilities included statutory waivers authorized under the Coronavirus Aid, Relief, and Economic Security (CARES) Act, regulatory waivers, and other flexibilities offered by HUD within the same period.

The purpose of this study is to understand how and why PHAs chose to implement these waivers and flexibilities and the related successes and challenges. The researchers analyzed data from the CARES Act Waiver Reporting Tool (CAWRT) to identify trends in waiver adoption among PHAs, examined HUD administrative data to explore the impacts of select waivers on PHA operations and service delivery, and gathered feedback from PHAs on the utility of these waivers in enhancing PHA operations and supporting assisted households during the pandemic. Insights from PHAs may provide HUD with helpful trends and on-the-ground facts as the agency considers future policy and program implications related to PHA waivers. This study builds on the findings of a similar study published by the Urban Institute in 2021 (King-Viehl, Champion, and Popkin, 2021).

Summary of the Urban Institute Study (King-Viehl, Champion, and Popkin, 2021)

The Urban Institute documented the early outcomes of the CARES Act waivers based on information from leaders of 10 PHAs. The most implemented waivers and their accompanying early outcomes included—

- **Adoption of remote hearings, briefings, and housing counseling:** Virtual meetings addressed pre-pandemic issues like client travel costs and insufficient staff time.
- **Allowance of owner certification instead of third-party inspections:** Self-certification improved workflow, allowing limited staff to assist more residents.
- **Delay of annual reexaminations of family income and composition:** Deadline extensions allowed PHAs to focus on more pressing issues.

The study found that the size of PHAs affects the challenges and outcomes of regulatory waivers. Smaller PHAs may find technology cost-prohibitive, but larger PHAs with better information technology (IT) departments benefit more from remote work or virtual inspections. Each PHA decides which waivers to implement, so the impact is best understood on a case-by-case basis.

1.1 Study Objectives and Research Questions

This study aims to achieve four research objectives related to the CARES Act waivers: to understand implementation, identify trends and characteristics of adopters, document outcomes, and explore policy and program implications. To address the study's objectives, the researchers employed a mixed methods approach comprising four main components—

- **Document Review:** The researchers examined HUD documents and reports to understand the background, authorization, and implementation of the CARES Act waivers.
- **CAWRT Data Analysis:** The researchers tabulated the CAWRT data to identify the most and least adopted waivers and the characteristics of PHAs that implemented or declined the waivers.
- **Semi-Structured Interviews:** The researchers interviewed PHA stakeholders, including leadership, operations staff, and residents from 53 PHAs that adopted the waivers and 6 PHAs that declined the waivers. From these stakeholders, the team gathered qualitative insights into the outcomes of the waivers on PHA operations and assisted households.
- **HUD Administrative Data Analysis:** The researchers analyzed HUD administrative data to assess the influence of waiver adoption on PHA service quality and performance metrics.

Exhibit 1.1 lists each of the research questions (RQs), organized within the four study objectives.

Exhibit 1.1 | Research Questions Addressed in This Study

Implementation	
RQ1.	What pre-existing programs or initiatives led to or influenced the authorization and implementation of PHA waivers offered by the CARES Act?
RQ2.	Prior to the CARES Act, what kind of waivers and flexibilities were available to PHAs?
RQ3.	What was the process for implementing and utilizing the waivers offered by the CARES Act?
RQ4.	What HUD guidance and support were available for PHAs for implementing waivers offered by the CARES Act, and how were the guidance and support provided?
RQ5.	How did the authorization of the CARES Act change how PHAs implemented waivers?
RQ6.	How did PHAs and HUD track the implementation of waivers?
Trends and Characteristics	
RQ7.	Which waivers offered by the CARES Act were the least and most adopted, and why did PHAs tend to utilize some of these waivers more than others?
RQ8.	What are the characteristics of PHAs that utilized waivers offered by the CARES Act and those that did not utilize these waivers?
RQ9.	How did Moving to Work (MTW) PHAs utilize waivers compared with non-MTW PHAs?
RQ10.	Why did some PHAs decline the utilization of all waivers offered by the CARES Act, and what were the characteristics of these PHAs?
Outcomes	
RQ11.	Based on available evidence, how (if at all) did waivers authorized by the CARES Act benefit assisted households?
RQ12.	Based on available evidence, how (if at all) did waivers authorized by the CARES Act negatively affect assisted households?
RQ13.	How did waivers authorized by the CARES Act affect service delivery models and general PHA operations? <ul style="list-style-type: none"> a. How did these waivers affect the quality of services and operations? b. How did these waivers affect the PHA workload?
RQ14.	How did waivers offered by the CARES Act change PHA reporting of administrative data? How did related changes (if any) affect program and performance monitoring?
RQ15.	How did additional PHA funding offered by the CARES Act (such as increased operating subsidies for Public Housing and increased administrative fees for HCV) affect how PHAs adopted or implemented waivers?
RQ16.	How did the expiration of waivers authorized by the CARES Act affect PHAs and assisted households?
RQ17.	How did the removal of HUD's review and approval process for waivers authorized by the CARES Act affect PHAs? What were the related challenges and benefits?
RQ18.	How did HUD's efforts to continue some of the flexibilities offered by the CARES Act (for example, the expedited regulatory waivers) affect PHAs and assisted households?
Policy and Program Implications	
RQ19.	Which waivers would PHAs like to consider continuing through regulatory and statutory changes? <ul style="list-style-type: none"> a. What are the reasons for wanting to continue waivers? How would continuing the waivers benefit PHA operations or assisted households? How would discontinuing the waivers harm PHA operations or assisted households? b. What modifications (if any) would PHAs want to make to the waivers offered by the CARES Act if continued? c. Are there any waivers PHAs would want discontinued through regulatory and statutory changes? If so, which ones and why?
RQ20.	How can HUD improve PHA flexibilities (for example, waivers offered by the CARES Act) that do not require new legislation or congressional authorization?
RQ21.	How can HUD improve regulatory waivers offered to PHAs? Are expedited regulatory waivers a good continuation or alternative to the waivers offered by the CARES Act?

CARES Act = Coronavirus Aid, Relief, and Economic Security Act. HCV = Housing Choice Voucher. PHAs = public housing agencies.

1.2 Organization of the Report

This report consists of five chapters and five appendices.

- Chapter 1: Introduction
- Chapter 2: Background on the CARES Act Waivers
- Chapter 3: Study Design and Methodology
- Chapter 4: Study Findings
- Chapter 5: Conclusion
- Appendix A: Research Questions and Participating PHAs
- Appendix B: Sample Development
- Appendix C: Data Collection Instruments
- Appendix D: Supplemental Tables
- Appendix E: Results from the Exploratory Analysis of Administrative Data

Chapter 2. Background on the CARES Act Waivers

2.1 Overview and Timeline of Waivers

HUD offers waivers across its programs to allow flexibilities for programs and participants. In the context of this report, a waiver is an official authorization from HUD that allows public housing agencies (PHAs) to temporarily deviate from specific regulatory or statutory requirements. Regulatory waivers alter regulations established by HUD, whereas statutory waivers alter statutes established by Congress. HUD is authorized to grant regulatory waivers to PHAs at any time by the HUD Reform Act of 1989⁶ and 24 Code of Federal Regulations (CFR) 5.110. However, HUD cannot grant PHA waivers related to Congress-established statutory requirements unless Congress authorizes them.

In the typical waiver review and approval process, PHAs request a regulatory waiver in writing that includes a description of the program, a citation of the rule they are seeking to waive, the reason for requesting the waiver, and an explanation of how the waiver would help accomplish a needed outcome. An assistant secretary or above, or a similarly empowered individual at HUD, would review the request and make a determination. All granted waivers are published in the Federal Register (HUD, 2008).

In response to the COVID-19 pandemic, Congress passed the Coronavirus Aid, Relief, and Economic Security (CARES) Act, which the President signed into law on March 27, 2020. This act granted HUD the authority to issue statutory waivers, allowing PHAs to maintain their programs while adapting to the pandemic environment. HUD used this authority to publish a series of notices that gave PHAs the ability to either waive requirements or, in some cases, use alternative requirements to administer their programs. These notices enabled PHAs to immediately implement regulatory and statutory waivers at their discretion without the typical HUD review and approval process used for regulatory waivers.

Waivers could be in the form of—

- **Waiving a requirement.** For example, the PH-12 Public Housing Agency Annual Self-Inspections waiver waived the PHA's requirement to inspect each public housing project during the calendar year (CY) 2020.
- **Establishing alternative requirements.** Some requirements could not be bypassed, but HUD offered alternative methods of meeting particular requirements. For example, the Housing Quality Standards (HQS)-2: Project-Based Voucher (PBV) Pre-Housing Assistance Payments (HAP) Contract Inspections: PHA Acceptance of Completed Units waiver altered the typical inspection process to allow for owner certification of non-life-threatening deficiencies in a unit.

⁶ The HUD Reform Act of 1989 amended the 1974 Reform Act, which granted HUD the authority to issue regulatory waivers or alternative requirements when necessary. The 1989 Reform Act introduced the requirement that all waivers be in writing and specify the grounds for the waiver. The HUD Reform Act of 1989 also established the current procedures for requesting and approving regulatory waivers.

In addition to waivers, HUD offered guidance on several operational flexibilities meant to streamline and enhance programs to effectively deliver services remotely. These flexibilities used existing regulatory provisions and could be utilized without a waiver or advanced approval from HUD. One example of operational flexibility clarified during this period is remote video inspections.

For this report, CARES Act Waivers refer to the statutory and regulatory waivers as well as the flexibilities HUD's Office of Public and Indian Housing (PIH) offered through four major notices: PIH 2020-05, 2020-13, 2020-33, and 2021-14. These notices were issued between April 10, 2020, and May 4, 2021, with many waivers and flexibilities expiring by December 31, 2021.

The CARES Act waivers were HUD pre-approved and, therefore, did not need to be requested or published in the Federal Register. The first notice, PIH 2020-05,⁷ indicated that PHAs should keep track of the waivers they adopted and the dates of adoption because "HUD may subsequently require the PHA to provide information to HUD on the waivers used." The notice did not specify when or what method would be used. Prior to the expiration of the CARES Act waivers, PIH Notice 2021-33⁸ directed PHAs to report their waiver adoption using the CARES Act Waiver Reporting Tool (CAWRT), an online database where PHAs were required to identify the waivers they chose to adopt.

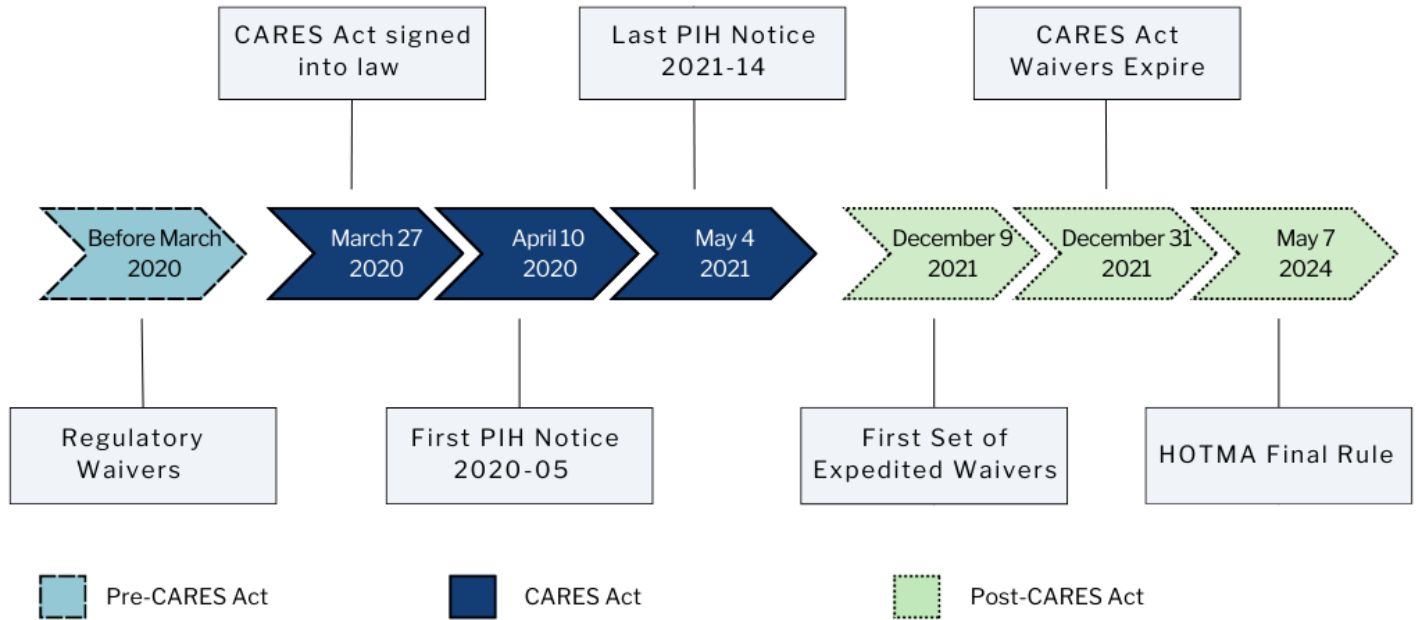
Just before the expiration of the waivers on December 31, 2021, HUD issued a set of expedited waivers, which were originally part of the CARES Act waivers. All expedited waivers are regulatory, as the authority to issue statutory waivers under the CARES Act had expired. These expedited waivers followed a simplified approval process, making it easier for PHAs to adopt them than HUD's standard regulatory waiver process. All other waiver requests were returned to the previous process. **Exhibit 2.1** provides a timeline for the authorization of various waivers.

The researchers refer to waivers granted via HUD's waiver process prior to the CARES Act as "pre-CARES Act waivers" (as shown in exhibit 2.1, represented by the heading "HUD Reform Act of 1989"), those authorized under the CARES Act as "CARES Act waivers," and those after the CARES Act as "post-CARES Act waivers" unless specifically referring to expedited waivers, which they continue to refer to as "expedited waivers." Although these categories overlap to some extent, the distinctions help establish a linear timeline that highlights the unique characteristics of each period.

⁷ PIH Notice 2020-05: <https://www.hud.gov/sites/dfiles/PIH/documents/PIH2020-05.pdf>

⁸ PIH Notice 2021-33: <https://www.hud.gov/sites/dfiles/PIH/documents/PIH2021-33.pdf>

Exhibit 2.1 | Timeline of Regulations and Notices Impacting Waivers



Note: HOTMA Final Rule refers to the HOMTA: Housing Choice Voucher (HCV) and Project-Based Voucher Implementation; Additional Streamlining Changes rule

2.2 Pre-CARES Act Regulatory Waiver Requests Granted to PHAs

To gain context on the kinds of regulatory waivers and flexibilities granted to PHAs prior to the CARES Act, the researchers reviewed regulatory waiver listings in the Federal Register for each quarter of 2018 and 2019. HUD has been required to publish all regulatory waivers they have approved on a quarterly basis in the Federal Register since the passage of the HUD Reform Act of 1989. The researchers grouped the regulatory waivers into six categories based on similarity in the language used under the ‘reason waived’ subheading of the Federal Register notices.

1. **Furtherers HUD Mission Waivers** advance HUD’s mission to “create strong, sustainable, inclusive communities and quality affordable homes for all.”⁹ HUD awards mission-driven waivers on a case-by-case basis. PHAs must show a compelling circumstance or seek to preserve benefits compromised by some regulation. For example, on March 8, 2018, Sterling Green Village Homes in Channelview, Texas, obtained a waiver to forgo the requirement that a site contain no less than five rental dwelling units. This change allowed the property to be refinanced as a single project, enabling the project to further HUD’s mission by producing more quality affordable housing.

⁹ HUD Mission: <https://www.hud.gov/about/mission>

2. **Natural Disaster Relief Waivers** provide relief in any capacity for residents affected by a recent natural disaster. In such a case, HUD—

- Obtains reports on impacted communities.
- Provides information to PHAs and affected HUD grantees.
- Implements continuity plans.
- Assesses damage or vacancies of HUD-supported units.

PHAs can then submit a waiver or flexibility request to the HUD field office based on the available information. Waivers previously granted in this context have included waivers for delayed submission of financial reports and expedited vacancy approvals, canceled public housing inspections, removed project cost caps, and revised tenant selection policies.¹⁰ HUD also has an expedited process for requests to waive HUD’s regulatory or administrative requirements for PHAs during Presidentially Declared Disasters.¹¹

3. **Practicality and Feasibility Waivers** remove or alter an impractical or infeasible regulation based on the circumstances of the requesting PHA. These waivers may be granted when a regulation, as applied to a specific scenario, conflicts with the spirit of the regulation, making it impractical to enforce. For example, on February 13, 2018, the County of Hawaii in Hilo, Hawaii, was granted a waiver to reduce their utility allowance schedule for a project-based housing site due to their energy conservation measures.
4. **Deadline Extension Waivers** provide extensions for project completion, submission of a waiver renewal request, submission of audited financial information, or accommodation for any other time extension. This category does not include extensions granted because of natural disasters.
5. **Other Waivers** address requests that present unique challenges or do not fall neatly under one of the first five categories.

Exhibit 2.2 displays the number of waivers granted by category in 2018 and 2019. The number of waivers granted reflects the number of notices for the given category in a calendar year, which may include multiple PHAs. Therefore, the number of PHAs affected by these waivers may be higher than the number of waivers granted. The number of waivers granted in 2019 decreased by 59 percent compared with 2018, primarily because of the number of natural disaster relief waivers granted in 2018 to PHAs impacted by Hurricane Irma and Hurricane Maria. In both cases, the number of waivers granted is significantly fewer than the 1,642 PHAs that adopted waivers during the pandemic, according to the CAWRT data, and represents less than 2 percent of the total number of PHAs (3,810).

¹⁰ PIH Notice 2018-16 <https://www.hud.gov/sites/dfiles/OCHCO/documents/18-16pihn.pdf>

¹¹ This process began in 2019 and has continued through subsequent Federal Register notices until the present day (HUD, 2024)

Exhibit 2.2 | Pre-Cares Act HUD Waivers Granted in 2018 and 2019

Regulatory Waiver Categories	2018 Waivers Granted ^{12 13 14 15}	2019 Waivers Granted ^{16 17 18 19}
Category 1: Furthers HUD's Mission	16	11
Category 2: Natural Disaster Relief	25	3
Category 3: Practicality and Feasibility	4	5
Category 4: Deadline Extension	7	2
Category 5: Other	4	2
Total	56	23

CARES Act = Coronavirus Aid, Relief, and Economic Security Act

Note: These waiver categories were created by the researchers based on similarity in the language used under the 'reason waived' subheading of the Federal Register notices.

2.3 Summary of Waivers Offered with Authority from the CARES Act

This section covers the HUD-issued regulatory and statutory waivers authorized under the CARES Act to help PHAs navigate pandemic-related challenges. Between April 2020 and May 2021, HUD published six notices providing PHAs with an extensive list of waivers (See **exhibit 2.3**).

At the same time, HUD also issued two notices providing guidance on flexibilities focused on remote operations. The notices for these flexibilities are also included in **exhibit 2.3**, as highlighted in blue.

¹² Federal Register Q1 2018: <https://www.federalregister.gov/documents/2018/06/29/2018-14082/notice-of-regulatory-waiver-requests-granted-for-the-first-quarter-of-calendar-year-2018>

¹³ Federal Register Q2 2018: <https://www.federalregister.gov/documents/2018/10/01/2018-21260/notice-of-regulatory-waiver-requests-granted-for-the-second-quarter-of-calendar-year-2018>

¹⁴ Federal Register Q3 2018: <https://www.federalregister.gov/documents/2019/02/05/2019-01077/notice-of-regulatory-waiver-requests-granted-for-the-third-quarter-of-calendar-year-2018>

¹⁵ Federal Register Q4 2018: <https://www.federalregister.gov/documents/2019/04/23/2019-08170/notice-of-regulatory-waiver-requests-granted-for-the-fourth-quarter-of-calendar-year-2018>

¹⁶ Federal Register Q1 2019: <https://www.federalregister.gov/documents/2019/07/01/2019-14012/notice-of-regulatory-waiver-requests-granted-for-the-first-quarter-of-calendar-year-2019>

¹⁷ Federal Register Q2 2019: <https://www.federalregister.gov/documents/2019/09/19/2019-20250/notice-of-regulatory-waiver-requests-granted-for-the-second-quarter-of-calendar-year-2019>

¹⁸ Federal Register Q3 2019: <https://www.federalregister.gov/documents/2019/11/22/2019-25390/notice-of-regulatory-waiver-requests-granted-for-the-third-quarter-of-calendar-year-2019>

¹⁹ Federal Register Q4 2019: <https://www.federalregister.gov/documents/2020/04/16/2020-08052/notice-of-regulatory-waiver-requests-granted-for-the-fourth-quarter-of-calendar-year-2019>

- The first notice, PIH 2020-31, discussed remote video inspections for the Housing Choice Voucher (HCV) program.
- The second notice, PIH 2020-32, addressed remote hearings and remote briefings.

Each notice outlines the proper procedures for utilizing technology in these applications. The PHAs interviewed in this report commonly confused these two flexibilities with waivers provided via the CARES Act. Despite being available before the pandemic, neither practice was widely used, and specific guidance was not issued. The emerging guidelines coinciding with the CARES Act waiver PIH Notices and a mention of remote briefings in the notices together account for some confusion. Exhibit 2.3 describes the notices, with waiver notices in the unshaded cells and flexibility notices in the shaded cells.

Exhibit 2.3 | CARES Act Waiver and Flexibility Notices

Notices and Dates Issued	Description of Each Notice
PIH 2020-05²⁰ April 10, 2020	This first notice HUD published implemented the bulk of HUD's waivers and specified the alternative requirements that a PHA would need to adopt in certain instances. This notice separated short-term and long-term waivers available through July 31, 2020, and December 31, 2020, respectively.
PIH 2020-13²¹ July 2, 2020	Although this notice includes several changes to the initial notice, the most important change was the extension of many short-term waivers through December 31, 2020. HUD also mandated that PHAs publicly post or make available a list of the waivers they adopted.
PIH 2020-20²² August 6, 2020	This notice contains waivers affecting the Section 8 Moderate Rehabilitation Program.
PIH 2020-22²³ September 8, 2020	This notice contains waivers affecting the Mainstream Voucher Program.
PIH 2020-31²⁴ November 12, 2020	This notice clarifies Remote Video Inspections (RVI) for the Housing Choice Voucher program. RVI was not a waiver but an important flexibility.
PIH 2020-32²⁵ November 20, 2020	This notice provides clarification on the allowability of remote hearings and remote briefings. Remote hearings and briefings were not waivers but important flexibilities.

²⁰ PIH Notice 2020-05 <https://www.hud.gov/sites/dfiles/PIH/documents/PIH2020-05.pdf>

²¹ PIH Notice 2020-13 <https://www.hud.gov/sites/dfiles/PIH/documents/ATT-SECOND-WAIVER-NOTICE.pdf>

²² PIH Notice 2020-20 <https://www.hud.gov/sites/dfiles/PIH/documents/pih2020-20.pdf>

²³ PIH Notice 2020-22 <https://www.hud.gov/sites/dfiles/PIH/documents/PIH-2020-22-OPHVPCARESActImplementationForMainstream.pdf>

²⁴ PIH Notice 2020-31 <https://www.hud.gov/sites/dfiles/PIH/documents/PIH-2020-31.pdf>

²⁵ PIH Notice 2020-32 <https://www.hud.gov/sites/dfiles/PIH/documents/PIH-2020-32.pdf>

Notices and Dates Issued	Description of Each Notice
PIH 2020-33 ²⁶ November 30, 2020	This notice added new waivers to those already in place and alternative requirements for pre-existing waivers. It also incorporated specific waivers that affected the Section 8 Moderate Rehabilitation ²⁷ Program and Mainstream Voucher Program.
PIH 2021-14 ²⁸ May 4, 2021	This notice established certain new waivers and clarified prior waivers already in place. It also extended most CARES Act waivers through December 31, 2021. ²⁹

CARES Act = Coronavirus Aid, Relief, and Economic Security Act. PHAs = public housing agencies. PIH = Public and Indian Housing.

Note: Waiver notices appear in white cells, and flexibility notices appear in blue cells.

HUD identified 68 PHA requirements that might benefit from statutory or regulatory waivers. Waivers were then categorized based on the relevant statutory or regulatory authorities codified in U.S. bills, acts, and laws, and the type of programs to which the waivers would be most applicable. **Exhibit 2.4** shows the categories of waivers offered and the number of waivers in each category. These waivers enabled PHAs to adapt their programs to ensure the continuity of critical operations and services for residents and tenants during the pandemic.

PHAs could implement any waivers that would best support their continued operations.

Exhibit 2.4 | Waivers Offered by the Coronavirus Aid, Relief, and Economic Security (CARES) Act by Type

Waiver or Alternative Requirement Category	Number of Waivers
Public Housing and Housing Choice Vouchers (HCV) Program Waivers	9
HCV Program Only Waivers	15
Public Housing Program Only Waivers	14
Housing Quality Standards Inspection in HCV Program Waivers	11

²⁶ PIH Notice 2020-33 <https://www.hud.gov/sites/dfiles/PIH/documents/PIH2020-33.pdf>

²⁷ “The Moderate Rehabilitation program provides project-based rental assistance for low-income households. The program was repealed in 1991 and no new projects are authorized for development. Assistance is limited to properties previously rehabilitated pursuant to a HAP contract” (HUD, n.d.-b).

²⁸ PIH Notice 2021-14 <https://www.hud.gov/sites/dfiles/PIH/documents/PIH2021-14.pdf>

²⁹ “Mainstream vouchers assist non-elderly persons with disabilities and are administered using the same rules as other housing choice vouchers. Funding and financial reporting for Mainstream Vouchers is separate from the regular tenant-based voucher program” (HUD, n.d.-c).

Waiver or Alternative Requirement Category	Number of Waivers
Public Housing Assessment System (PHAS), Section Eight Management Assessment Program (SEMAP), and Uniform Financial Reporting Standards Waivers	5
Moderate Rehabilitation Program Waivers	6
Mainstream Voucher Waivers	3
Other Waivers and Administrative Relief	5
Total	68

Source: U.S. Department of Housing and Urban Development, Office of Public and Indian Housing, “Notice PIH 2021-14”

Overview of Waivers or Alternative Requirement Categories

Public Housing and HCV Programs Waivers: This set of waivers applied to the HCV and Public Housing programs. These waivers—

- Allowed for delayed annual reexaminations of family income and composition, changes to income verification requirements during annual reexaminations, and modifications to interim reexaminations of family income and composition. PHAs could consider self-certification of income and other eligibility factors if they assumed responsibility for discrepancies that might arise later.
- Extended Family Self-Sufficiency (FSS) contracts.
- Altered the public notice requirements for opening and closing waiting lists.

HCV Program Only Waivers: This set of waivers was exclusively applicable for the HCV program. These waivers—

- Granted PHA extensions for administrative plan and utility allowance review.
- Offered greater discretion on voucher extensions, extended absences (particularly for health reasons), and extended the grace period before an automatic termination of a HAP contract in instances where the HAP, or the subsidy paid by the PHA, was reduced to \$0.
- Allowed PHAs to assist youth for longer than normal and receive referrals from child welfare agencies for a longer period to avoid youth falling into homelessness.
- Permitted PHAs to use expanded information packets instead of oral briefings.
- Allowed for an increase in payment standard during the HAP contract term rather than waiting for the next contract term and provided the ability for a family in the PBV or Enhanced Voucher (EV) program to lease a unit with more bedrooms than the family would qualify for under PHA subsidy standards. The HCV program always had this ability.

- Adjusted homeownership counseling requirements and extended the maximum term of homeownership assistance.

Public Housing Program Only Waivers: This set of waivers only applies to the Public Housing program. These waivers—

- Increased funding and development cost limits and allowed for labor force changes.
- Allowed extensions for scheduled resident council elections, utility allowance updates, energy audit due dates, designated housing plan renewals, and closeout document deadlines.
- Waived project inspection requirements, over-income family termination requirements, Community Service and Self-Sufficiency (CSSR) requirements, and advance notice requirements (except for with policies related to tenant charges).

Housing Quality Standards (HQS) Verification in HCV program waivers: This set of waivers only applied to the HQS for the Housing Choice Voucher program. These waivers—

- Allowed owners and tenants to self-certify instead of using third-party inspections and allowed PHAs to verify repairs to a unit using alternative methods. PHAs had to agree to inspect self-certified units later. Some inspections could be delayed if there were no life-threatening deficiencies.
- Relaxed the requirement that each unit have at least one bedroom for every two people for existing leases where the household needed to add an additional member as a result of the pandemic.

Public Housing Assessment System (PHAS), Section Eight Management Assessment Program (SEMAP), and Uniform Financial Reporting Standards Waivers: This set of waivers applied to administrative reporting requirements that evaluate the performance of PHAs. These waivers—

- Allowed PHAs to carry forward the most recent SEMAP and PHAS scores on record.
- Provided extensions for financial reporting deadlines.
- Allowed for remote SEMAP performance reviews to change PHA ratings from troubled to standard or high performing.

Moderate Rehabilitation Program (MR) Waivers: This set of waivers applied exclusively to the Moderate Rehabilitation program. These waivers—

- Addressed annual re-examinations of family income and composition, income verifications, and allowance-monitoring reviews.
- Adjusted Enterprise Income Verification (EIV)-monitoring.
- Changed PHA inspection requirements for annual inspections.
- Adjusted utility allowances.

Mainstream Voucher (MS) Waivers: This set of waivers applied exclusively to the mainstream voucher program. These waivers—

- Allowed PHAs to establish alternative screening requirements for criminal records.
- Allowed PHAs to expand the definition of a non-elderly person to account for limited pandemic PHA operations.
- Allowed for non-standard lease terms lasting less than 1 year.

Other Waivers and Administrative Relief: This set of waivers applied to administrative requirements outside the previously outlined performance requirements. These waivers—

- Provided a range of administrative flexibilities to PHAs, including extensions of the submission deadlines for HUD Form 50058, programmatic obligation and expenditure of capital funds, and the statutory and regulatory substantial improvement requirements for troubled PHAs based on PHAS scores.
- Allowed HUD more than 60 days to review Designated Housing Plans.

2.4 HUD Guidance on Waiver Implementation and Expiration

In addition to the PIH Notices, which defined each waiver and its application, HUD offered guidance on waivers provided under the authority of the CARES Act on its homepage under the Coronavirus (COVID-19) tab. Specifically, HUD offered resources like toolkits, policy notices, and informational flyers for PHAs and their residents. It addressed feasibility and implementation concerns through a series of Frequently Asked Question reports (HUD, n.d.-d).³⁰ In November 2021, HUD published a webpage to assist PHAs in navigating CARES Act waiver expiration dates (HUD, n.d.-e).³¹ This webpage includes seven guides focused on managing the expiration of waivers in different functional business areas of PHA operations, as shown in **exhibit 2.5**.

³⁰ HUD PIH Frequently Asked Questions is available at:
<https://www.hud.gov/sites/dfiles/PIH/documents/round7pihFAQs.pdf>

³¹ HUD Navigating Waiver Expiration Website is available at:
https://www.hud.gov/program_offices/public_indian_housing/covid_19_resources/navigating_waiver_expiration

Exhibit 2.5 | HUD Guidance on Navigating CARES Act Waiver Expiration³²

Verification
<ul style="list-style-type: none"> • Provided instructions to verify income, citizenship, social security numbers, and proof of family composition.
Inspections
<ul style="list-style-type: none"> • Provided information regarding public housing (PH) and Housing Quality Standards (HQS) inspections for PHAs that adopted waivers related to inspections that were unsafe or infeasible during the pandemic.
Occupancy Policies
<ul style="list-style-type: none"> • Detailed expiration of waivers designed to allow families to remain in subsidized housing.
PBV and Enhanced Voucher Provisions on Under-Occupied Units
<ul style="list-style-type: none"> • Addressed waivers related to lease agreements or rental assistance in Project Based Voucher (PBV) units.
Capital Programs
<ul style="list-style-type: none"> • Provided guidance on capital program operations where remote work could remain in place.
Uniform Financial Report Standards
<ul style="list-style-type: none"> • Explained requirements for the submission of unaudited and audited financial statements.
Community Service and Self-Sufficiency Requirement
<ul style="list-style-type: none"> • Contained information applicable to non-exempt adult residents required to fulfill the Community Service and Self-Sufficiency Requirement (CSSR).

CARES Act = Coronavirus Aid, Relief, and Economic Security Act.

2.5 Tracking Waiver Implementation

PHAs did not need to notify HUD or obtain HUD approval to begin using the waivers and flexibilities listed in exhibit 2.3. However, PHAs were required to post a public list of any waivers they chose to adopt.³³ HUD asked PHAs to record the waivers they adopted and their effective dates, indicating they might ask PHAs to report on this information later. Through PIH Notice 2021-33,³⁴ HUD asked PHAs to record information on their waiver adoption using the CARES Act Waiver Reporting Tool (CAWRT).³⁵ The CAWRT was released on December 6, 2021, before the CARES Act waivers expired. For PHAs that chose

³² HUD's Navigating Waiver Expiration Website is available at:

https://www.hud.gov/program_offices/public_indian_housing/covid_19_resources/navigating_waiver_expiration

³³ PIH Notice 2020-05 <https://www.hud.gov/sites/dfiles/PIH/documents/PIH2020-05.pdf>

³⁴ <https://www.hud.gov/sites/dfiles/PIH/documents/PIH2021-33.pdf>

³⁵ CAWRT Form https://forms.office.com/pages/responsepage.aspx?id=xSRVYekizUuokxGApT_Hslk7p_g9RZZJlie_yNAaTudUM1BXNUpeUzhZWfhtTEVNQVQ2WlGxWVFPSyQIQCN0PWcu&wdLOR=c251ADF4A-B5A5-4CAB-B70F-A96F9A4FF443

to adopt waivers, the CAWRT asked which waivers they had adopted and their adoption date. For waivers that could apply to multiple program types, PHAs had to specify the applicable program. PHAs that did not adopt any waivers were still asked to complete the CAWRT form and simply indicate that their PHA had not adopted waivers. All PHA responses are available on the CAWRT Data Dashboard on HUD's website.³⁶ The dashboard shows the types of waivers adopted, PHA adoption rates, and waiver adoption by region and date. Approximately 84 percent (3,200 PHAs) of 3,810 PHAs reported waiver usage using the CAWRT tool.

2.6 Post-CARES Act Waivers and Flexibilities

This section discusses post-CARES Act waivers, including expedited waivers and continued flexibilities granted to PHAs after the expiration of the CARES Act waiver authority. Most of the regulatory and statutory waivers HUD provided to PHAs during the pandemic expired on December 31, 2021. HUD's broad authority to issue statutory waivers expired at the same time. Slightly before the expiration of the CARES Act waivers, on December 9, 2021, HUD released PIH Notice 2021-34³⁷ with five regulatory waivers eligible for an expedited review process and four flexibilities PHAs could continue to offer—

Expedited Regulatory Waivers

- **Increase in Payment Standard During HAP Contract Term**—Allowed PHAs to increase the payment standard for a family at any time instead of waiting until the next regular reexamination.
- **SEMAP Score**—Allowed PHAs to waive SEMAP if the PHA's SEMAP indicators were affected by the adoption of CARES Act waivers.
- **Term of Voucher: Extensions of Term**—Allowed PHAs to grant extensions of the initial voucher term, regardless of the policy described in the Administrative Plan. PHAs were then meant to ensure consistency with these requests and comply with the PHA's informally adopted interim standard.
- **Homeownership: Maximum Term of Assistance**—Allowed PHAs to extend homeownership assistance for up to a year.
- **Voucher Tenancy: New Payment Standard Amount**—Allowed PHAs to set a payment standard up to 120 percent of the Fair Market Rent (FMR).

Continued Flexibilities

- **Deadlines for Capital Funds Grants**—Allowed PHAs to extend obligation dates and expenditure deadlines for Capital Funds grants that opened prior to January 1, 2021, with extensions lasting up to 24 months. PHAs could also extend close-out

³⁶ CAWRT Dashboard https://www.hud.gov/program_offices/public_indian_housing/covid_19_resources/cawrt_data_dashboard

³⁷ PIH Notice 2021-34 <https://www.hud.gov/sites/dfiles/OCHCO/documents/2021-34pihn.pdf>

documents for grants opened prior to March 19, 2020, with extensions lasting up to 1 year from the end of the period of performance.

- **Income Verification Hierarchy**—Provided PHAs with an exception to third-party verification of income assets or expenses if third-party verification was unavailable.
- **Remote Video HQS Inspection**—Allowed PHAs to continue to perform remote, video-assisted, or “virtual” HQS inspections for units or to identify maintenance needs.
- **PHA Oral Briefing**—Notified PHAs of their continuing ability to use alternative methods to provide oral briefings, including but not limited to phone, webcast, video calls, or other virtual methods.

Unlike the waivers provided under the authority of the CARES Act, HUD required approval for expedited regulatory waivers. However, they had an expedited justification and approval process as compared with typical regulatory waivers. The approval process for an expedited waiver was much faster than the review process for a non-expedited regulatory waiver, which still required the regulatory waiver approval process that existed prior to the passage of the CARES Act. HUD also outlined examples of “good cause” justifications for waivers, which included increased vacancies, insufficient staffing, and other pandemic-related limitations. PHAs were initially required to submit their requests for the expedited regulatory waivers by March 1, 2022. This deadline was later extended to April 1, 2022.³⁸

On April 11, 2022, HUD published PIH Notice 2022-09 to continue expedited waivers for: the Increase in Payment Standard during HAP Contract Term waiver; the Term of Voucher: Extension of Term waiver; and the Voucher Tenancy: New Payment Standard Amount waiver.³⁹ The notice did not provide for an expedited review of requests but rather a streamlined waiver process for PHAs to continue requesting the waivers mentioned previously. The process for requesting streamlined waivers otherwise remained the same.

On September 26, 2022, HUD published PIH 2022-30 to extend the Increase in Payment Standard during HAP Contract Term waivers and the Voucher Tenancy: New Payment Standard Amount waivers.⁴⁰ These waivers were effective through December 31, 2023.

On October 12, 2023, HUD published PIH 2023-29 to announce four expedited regulatory waivers impacting adjustments to payment standards.⁴¹ These waivers are effective through December 31, 2024, and include the following—

- A. Exception payment standards up to 120 percent of the Small Area Fair Market Rent (SAFMR) for PHAs that are in mandatory SAFMR areas or have voluntarily chosen to adopt SAFMRs (“Opt-In PHAs”).

³⁸PIH Notice 2022-04. <https://www.hud.gov/sites/dfiles/OCHCO/documents/2022-04pihn.pdf>.

³⁹PIH Notice 2022-09. <https://www.hud.gov/sites/dfiles/OCHCO/documents/2022-09pihn.pdf>.

⁴⁰PIH Notice 2022-30. <https://www.hud.gov/sites/dfiles/OCHCO/documents/2022-30pihn.pdf>.

⁴¹ PIH Notice 2023-29. <https://www.hud.gov/sites/dfiles/OCHCO/documents/2023-29pihn.pdf>.

- B. Exception payment standards up to 120 percent of the FMR.
- C. Exception payment standards up to 120 percent for PHAs currently approved for exception payment standard SAFMRs.
- D. Application of an increase in the payment standard during the HAP contract term.

On May 10, 2024, HUD published PIH Notice 2024-17 to announce two expedited regulatory waivers for the HCV and public housing programs.⁴² These waivers were intended to assist PHAs in responding to families experiencing homelessness. The waivers are related to the documentation requirements for verifying date of birth and disability status, eligibility determination, and income verification. These expedited waivers make it easier for PHAs to house families experiencing homelessness quickly while the families assemble the necessary eligibility documents for the program.

The Housing Opportunity Through Modernization Act of 2016 (HOTMA)

HOTMA legislation changed federal rental assistance programs, including the Public Housing and HCV programs.⁴³ These changes include, but are not limited to, the following: changes in income examinations,⁴⁴ asset limitations,⁴⁵ treatment of over-income families in public housing,⁴⁶ inspections,⁴⁷ rules related to project-basing vouchers,⁴⁸ the establishment of fair market rents,⁴⁹ the Family Unification Program for youth aging out of foster care,⁵⁰ the capital fund and operating fund,⁵¹ payment standards,⁵² etc. The legislation was passed unanimously by both chambers of Congress (the House of Representatives and the Senate) and was signed by the President of the United States in 2016.

On May 7, 2024, HUD published a rule titled “Housing Opportunity Through Modernization Act of 2016—Housing Choice Voucher (HCV) and Project-Based Voucher [PBV] Implementation; Additional Streamlining Changes” in the Federal Register.⁵³ HOTMA states that “[HUD] shall allow public housing agencies to request exception payment standards within fair market rental

⁴² PIH Notice 2024-17. <https://www.hud.gov/sites/dfiles/OCHCO/documents/2024-17pihn.pdf>

⁴³ Housing Opportunity Through Modernization Act of 2016: <https://www.congress.gov/bill/114th-congress/house-bill/3700/text>

⁴⁴ Housing Opportunity Through Modernization Act of 2016 § 102.

⁴⁵ Housing Opportunity Through Modernization Act of 2016 § 104.

⁴⁶ Housing Opportunity Through Modernization Act of 2016 § 103.

⁴⁷ Housing Opportunity Through Modernization Act of 2016 § 101.

⁴⁸ Housing Opportunity Through Modernization Act of 2016 § 106.

⁴⁹ Housing Opportunity Through Modernization Act of 2016 § 107.

⁵⁰ Housing Opportunity Through Modernization Act of 2016 § 110.

⁵¹ Housing Opportunity Through Modernization Act of 2016 § 109.

⁵² Housing Opportunity Through Modernization Act of 2016 § 102(d)(1), § 107(b).

⁵³ See <https://www.federalregister.gov/d/2024-08601>.

areas subject to criteria and procedures established by [HUD].”⁵⁴ Using the broad authority that HOTMA provided to HUD to establish criteria and procedures for PHAs to request exception payment standards without needing explicit approval from HUD, HUD codified exception payment standard regulatory provisions that are similar, but not identical, to the regulatory waivers eligible for a streamlined waiver process in PIH Notice 2023-29.⁵⁵

2.7 Regulatory Waiver Requested and Granted Post-CARES Act

As most waivers offered through the authority of the CARES Act expired on December 31, 2021, the researchers examined post-CARES Act regulatory waiver listings in the Federal Register, beginning with the last quarter of 2021 and running through the third quarter of 2022.

Exhibit 2.6 displays the number of waivers requested and granted by category in 2021 and 2022. For a comparison, see exhibit 2.2 for the number of waivers requested and granted by category in 2018 and 2019 (pre-CARES Act). Beginning in the last quarter of 2021, PHAs could request a CARES Act regulatory waiver extension beyond the PIH Notice 2020-13 extension date. The researchers added a sixth category of waivers, Extension of CARES Act Waivers, to account for these waivers after those offered through the CARES Act authority expired in 2021. The researchers only categorized regulatory waivers that explicitly referred to a CARES Act waiver under this category. They placed other requests citing pandemic circumstances under the ‘Further HUD Mission’ category. The number of waivers granted reflects the number of notices for the given category in a calendar year, which may include multiple PHAs. Therefore, the number of PHAs affected by these waivers is potentially higher than the number of waivers granted. This outcome is particularly true for the seventh category, Extension of Cares Act Waivers. Despite the additional category and two natural disasters—Hurricane Fiona and the Western Kentucky tornados—the number of waivers granted in 2021 and 2022 resembles the count from 2018, indicating that the number of waivers requested and granted returned to pre-CARES Act numbers after the expiration of the CARES Act waivers.

⁵⁴ Housing Opportunity Through Modernization Act of 2016 § 107(b), 24 USC 1437f(o)(1)(b). Although HUD could grant exception payment standards under Section 8(o)(1)(d) of the U.S. Housing Act of 1937 before it was amended by HOTMA, it required “... a public housing agency to submit the payment standard of the public housing agency to [HUD] for approval ...” The authority provided by HOTMA allowed HUD to structure the regulation to allow a PHA to apply an exception payment standard if it met certain criteria without needing explicit approval from HUD.

⁵⁵ See 24 CFR § 982.503(d) as amended by the final rule mentioned previously.

Exhibit 2.6 | Waivers Granted to Public Housing Agencies (PHAs) in 2021 and 2022

Regulatory Waiver Categories	2021/2022 Waivers Granted ^{56 57 58 59}
Category 1: Furthers HUD's Mission	8
Category 2: Natural Disaster Relief	0
Category 3: Practicality and Feasibility	4
Category 4: Deadline Extension	0
Category 5: Other	5
Category 6: Extension of CARES Act Waivers	52
Total	69

CARES Act = Coronavirus Aid, Relief, and Economic Security Act.

Exhibit 2.7 displays the number of expedited or streamlined waivers granted during the first three quarters (Q) of 2022. Expedited waivers were not yet available in the last quarter of 2021. As a result, there are no expedited waivers for that quarter. The researchers examined only Q1–Q3 of 2022 to maintain consistency with exhibit 2.6. Despite the shorter time frame, significantly more expedited and streamlined waivers were granted in the first three quarters than standard waivers in the full year examined. Whereas the standard waivers granted from the first quarter of 2021 through the third quarter of 2022 was 69, HUD granted 2,227 expedited and streamlined waivers in the first three quarters of 2022 alone.

⁵⁶ Federal Register Q4 2021: <https://www.federalregister.gov/documents/2022/06/17/2022-13128/notice-of-regulatory-waiver-requests-granted-for-the-fourth-quarter-of-calendar-year-2021>

⁵⁷ Federal Register Q1 2022: <https://www.federalregister.gov/documents/2022/10/04/2022-21503/notice-of-regulatory-waiver-requests-granted-for-the-first-quarter-of-calendar-year-2022>

⁵⁸ Federal Register Q2 2022: <https://www.federalregister.gov/documents/2022/12/05/2022-26413/notice-of-regulatory-waiver-requests-granted-for-the-second-quarter-of-calendar-year-2022>

⁵⁹ Federal Register Q3 2022: <https://www.federalregister.gov/documents/2023/02/10/2023-02843/notice-of-regulatory-waiver-requests-granted-for-the-third-quarter-of-calendar-year-2022>

Exhibit 2.7 | Expedited or Streamlined Waivers Granted to Public Housing Agencies (PHAs) in Q1–Q3 of 2022

Expedited or Streamlined Waivers	2022 Q1–Q3 Waivers Granted ^{60 61 62}
Increase in Payment Standard During HAP Contract Term	474
SEMAP Score	733
Term of Voucher: Extensions of Term	448
Homeownership: Maximum Term of Assistance	41
Voucher Tenancy: New Payment Standard Amount	531
Total	2,227

CARES Act = Coronavirus Aid, Relief, and Economic Security Act. HAP = Housing Assistance Payment. Q = quarter. SEMAP = Eight Management Assessment Program.

Note: The first four expedited or streamlined waivers were offered under the CARES Act waivers. The last waiver, Voucher Tenancy: New Payment Standard Amount, was not part of the CARES Act waivers.

⁶⁰ Federal Register Q1 2022: <https://www.federalregister.gov/documents/2022/10/04/2022-21503/notice-of-regulatory-waiver-requests-granted-for-the-first-quarter-of-calendar-year-2022>

⁶¹ Federal Register Q2 2022: <https://www.federalregister.gov/documents/2022/12/05/2022-26413/notice-of-regulatory-waiver-requests-granted-for-the-second-quarter-of-calendar-year-2022>

⁶² Federal Register Q3 2022: <https://www.federalregister.gov/documents/2023/02/10/2023-02843/notice-of-regulatory-waiver-requests-granted-for-the-third-quarter-of-calendar-year-2022>

Chapter 3. Study Design and Methodology

To address the research questions, this study used a mixed methods approach consisting of four components—

1. **Document review** of existing HUD documents and reports to examine the background, authorization, and implementation of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) waivers.
2. **Analysis of the CARES Act Waiver Reporting Tool (CAWRT) data** to examine the most and least adopted waivers by public housing agencies (PHAs), the characteristics of PHAs that adopted at least one waiver, and the characteristics of PHAs that did not adopt any waivers.
3. **Interviews with PHAs** to understand their experience with CARES Act waivers, including how they decided which waivers to implement (or not) and their perceptions of the utility of the waivers. The data collection involved semi-structured interviews with stakeholders, including PHA leadership, operations staff, and residents⁶³ from a sample of PHAs that adopted waivers, and PHA leadership from a sample of PHAs that declined to adopt any waivers.
4. **Analysis of additional HUD administrative data** to examine the influence of the waivers on the quality of PHA services and operations, as well as program and performance measures. Specific sources of administrative data are described further in section 3.1.

This chapter describes each of these four methods.

3.1 Document Review

The document review provided insights into the background, authorization, and implementation of the CARES Act waivers. The researchers reviewed HUD documents, reports, HUD waiver notices, HUD guidance to PHAs, and Federal Register waiver announcements to identify relevant information. The researchers also reviewed websites of research and housing industry organizations, including the Urban Institute, the National Low Income Housing Coalition, the National Association of Housing and Redevelopment Officials, the Council of Large Public Housing Authorities, and the Public Housing Authorities Directors Association.

Exhibit 3.1 lists the sources of the documents the researchers reviewed. The researchers synthesized the information gathered from these documents, focusing on the authorization and implementation of the CARES Act waivers, and have presented the findings in **chapter 2**.

⁶³ Initially, the study aimed to interview Resident Advisory Board (RAB) members but discovered that many PHAs could not provide information on residents who were RAB members during the time of waiver implementation. Consequently, the researchers interviewed any available and willing residents who had knowledge about the changes during that time. See the “Limitations” section in chapter 5 for details.

Exhibit 3.1 | Document Search Sources

Topic of Interest	Resources/Related Documents
PHA Waiver Background and Implementation Processes	<ul style="list-style-type: none"> All PIH Notices on CARES Act waivers Direct guidance and webinars from housing industry organizations
Waiver Implementation Guidance Available to PHAs	<ul style="list-style-type: none"> All PIH Notices on CARES Act waivers PIH Notice on reporting CARES Act waivers CAWRT Instructions Waiver expiration guidance Letters from PIH to Housing Executive Directors
Regulatory Waivers Granted to PHAs Before and After the CARES Act	<ul style="list-style-type: none"> Federal Register notices of regulatory waiver requests that were granted All PIH Notices on expedited and streamlined waivers

CARES Act = Coronavirus Aid, Relief, and Economic Security Act. CAWRT = CARES Act Waiver Reporting Tool. PHA = public housing agencies. PIH = Public and Indian Housing.

3.2 CARES Act Waiver Reporting Tool Survey Data Analysis

HUD required all PHAs to record information regarding which CARES Act waivers they chose to implement into the CAWRT (HUD, n.d.-f). This tool collected and reported data to document waiver usage across PHAs. For PHAs that chose to adopt waivers, CAWRT recorded which waivers were adopted and the adoption dates. For waivers applicable to multiple program types, PHAs had to specify the program to which their waiver applied. HUD aggregated all PHA responses in the CAWRT Data Dashboard on its website (HUD, n.d.-g), showing: the types of waivers adopted, PHA adoption rates, and waiver adoption by region and date. HUD provided the researchers with the CAWRT survey data and a crosswalk data file that included the characteristics of PHAs, including PHA size, region, program type, and Moving to Work (MTW) status. The researchers merged the CAWRT data and the crosswalk file into an updated CAWRT dataset.

The researchers used the updated CAWRT data to determine the waivers that PHAs adopted the most and least often and to identify any trends in waiver adoption by PHA characteristics. To this end, the researchers used a logistic regression model that looked for significantly different characteristics between the PHAs that adopted waivers and the PHAs that did not. The model's dependent variable indicates waiver adoption, defined as a PHA having adopted any of the waivers offered by the CARES Act (1 = adopted waiver; 0 = did not adopt waiver). **Exhibit 3.2** lists the variables the researchers used in the logistic regression model obtained from the CAWRT data. The researchers present the findings from this analysis in **chapter 4**.

Exhibit 3.2 | Variables Used in Logistic Regression

Category	Variable Description	Variable Type
Dependent Variable	Waiver = 1 if the public housing agency (PHA) adopted a waiver, and 0 otherwise	Binary variable (1 and 0)
Independent Variables	Region	Categorical variables for each geographic region
	Program type	Categorical variables for each program type
	PHA size ⁶⁴	Categorical variables for each PHA size
	Moving to Work (MTW status)	Categorical variables for each MTW status

The researchers estimated propensity scores from the logistic regression described in exhibit 3.2. These propensity scores were used to match PHAs that adopted a waiver with PHAs that did not adopt a waiver. Matching PHAs that did not adopt a waiver were used as the comparison group in the analysis in Section 3.4.

Researchers also used the updated CAWRT data to select a sample of 59 PHAs for interviews. The next section further details the PHA sampling strategy. Refer to **appendix B** for details about the approach the researchers used to select the study sample.

3.3 Interviews with PHAs

The researchers completed 92 semi-structured interviews with PHA leadership, operational staff, and Resident Advisory Board members or assisted households from 59 PHAs. The interviews explored how CARES Act waivers affected PHA services, operations, and assisted households. Interviews also covered PHAs' prior experience with waivers before the CARES Act, additional flexibilities, and expedited and streamlined waivers.

3.3.1 Selecting the PHA Sample for the Interviews

The updated CAWRT dataset served as the sampling frame for the qualitative interviews. The researchers used a purposeful stratified sampling procedure to select the sample. The researchers grouped PHAs by characteristics outlined in the CAWRT Dashboard User Guide (see exhibit 3.2 for the list of characteristics). This process involved organizing the PHAs into strata based on key characteristics such as region, program type, PHA size, and MTW status. The researchers aimed to achieve variability across these characteristics. The

⁶⁴ HUD defines PHA sizes listed in the CAWRT dashboard by the combined unit totals, as follows—Extra Small (0-249); Small (250-549); Medium (550-4,999); Large (5,000-57,999); Extra-Large (58,000 Or Larger).

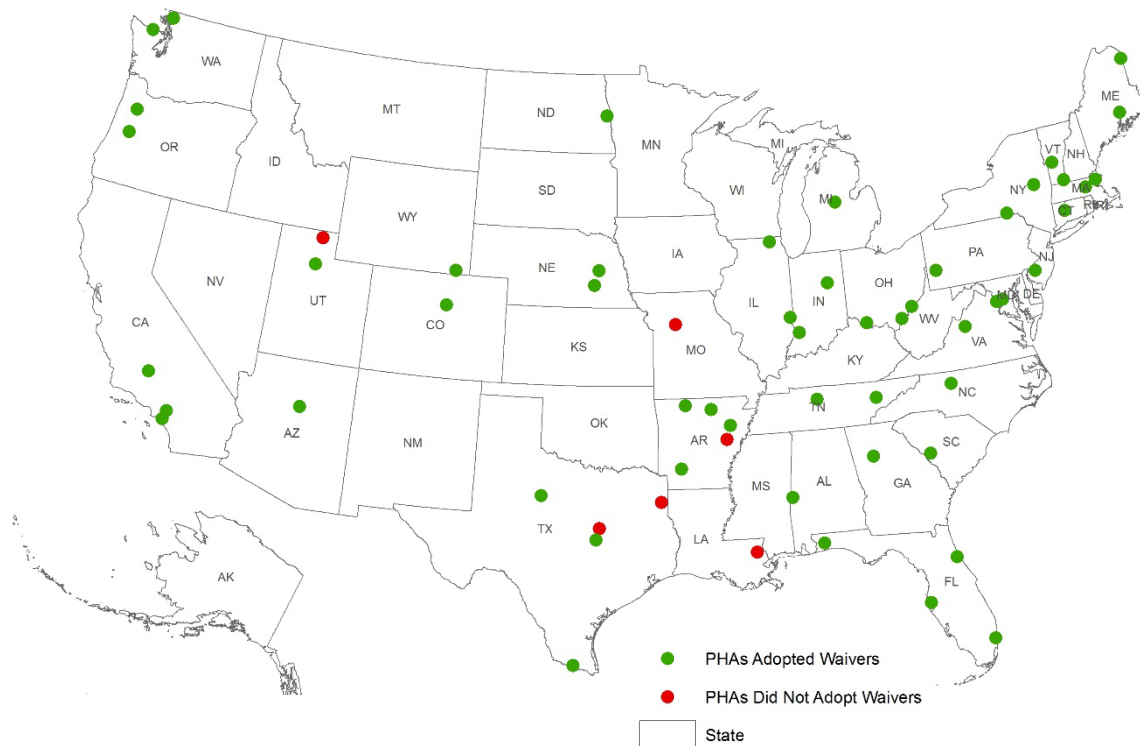
researchers randomly selected PHAs from each stratum to ensure a diverse and representative study sample.⁶⁵ CAWRT data show that 75 percent of PHAs that did not adopt waivers were small-sized. To ensure adequate representation, the researchers selected a mix of small- and medium-sized PHAs. The researchers also cross-checked the selected PHAs' implemented waiver types to ensure that the sample represented all the waiver types.

The researchers selected a larger sample of PHAs that adopted waivers (n = 45) than PHAs that did not adopt waivers (n = 5) for the interviews because most of the research questions are related to waiver implementation. In addition to the 50 PHAs selected, the researchers included alternate PHAs (10 PHAs that adopted at least one waiver and 5 PHAs that did not adopt any waivers) if any of the PHAs in the initial sample were unable to participate in the study. When the researchers began outreach to the initial sample of 50 PHAs, some respondents indicated they could not participate due to capacity constraints. In contrast, others noted that they did not have any staff with knowledge about their waiver implementation. As a result, the researchers selected alternative PHAs to include based on the sampling strategy until they achieved a minimum sample size of 50 PHAs. In some cases, PHAs that had previously been unable to participate or had not responded decided to join the study after the study had contacted alternatives. The researchers decided to move forward with the alternates and the original PHAs. Ultimately, the researchers interviewed 59 PHAs, comprising 53 PHAs that adopted one or more waivers and 6 PHAs that did not adopt any waivers. **Exhibit 3.3** shows the geographical locations of the sample.

Appendix B contains further information on the sampling strategy.

⁶⁵ There were only four PHAs in the extra-large PHA size category. As a result, the researchers merged the large and extra-large categories.

Exhibit 3.3 | Geographical Location of Sampled Public Housing Agencies (PHAs)



3.3.2 Development of the Interview Guide and Qualitative Data Collection

The researchers used information gathered from the document review, the CAWRT data, and discussions with HUD to develop a master guide for interviews with the different respondent groups. The researchers then organized the content of each master guide into standard domains based on the research questions, included questions specific to each PHA being interviewed, and prepared questions relevant to the types of stakeholders to be interviewed. **Appendix C** includes the master interview guide for each stakeholder. As shown in **exhibit 3.4**, the master interview guide included six question areas informed by the research and analysis of the CAWRT data. The six-question areas helped the researchers gather information about the roles of PHA staff, how PHAs implemented CARES Act waivers, and the outcomes of these waivers for PHAs and assisted households. The interviews also gathered information on challenges with implementing the waivers and recommendations for improving and expanding PHA flexibilities.

Exhibit 3.4 | Sections Comprising the Semi-Structured Master Interview Guide

1.	Respondent background
2.	Context affecting the implementation of PHA waivers offered by the CARES Act
3.	Process for the implementation of PHA waivers offered by the CARES Act
4.	Perceived outcomes of CARES Act waivers on PHAs and assisted households

5.	Challenges associated with the implementation of waivers offered by the CARES Act
6.	Recommendations for improvement, expansion, and sustainability of PHA flexibilities

CARES Act = Coronavirus Aid, Relief, and Economic Security Act. PHA = public housing agencies.

Respondents were organized into four groups to conduct the interviews (see **exhibit 3.5**). For small PHAs with few staff members, the researchers conducted one group interview with leadership and operational staff rather than individual interviews with both groups. Only six sampled PHAs had a Resident Advisory Board during the CARES Act waiver period. Therefore, the researchers, in consultation with HUD, agreed to include assisted households in the interviews to obtain insights into their experiences with the PHA operations affected by the waivers.

Exhibit 3.5 | List of Interview Respondent Groups

1.	Leadership at public housing agencies (PHAs) that adopted waivers
2.	Operations staff at PHAs that adopted waivers
3.	Resident Advisory Board members / assisted households at PHAs that adopted waivers
4.	Leadership at PHAs that declined to adopt waivers

The researchers scheduled 60-minute telephone interviews—with up to three interviews per PHA—from October 2023 through March 2024. Ultimately, the researchers conducted 92 interviews across 59 PHAs. This data collection effort included 86 interviews with 53 PHAs that adopted the waivers and 6 interviews with 6 PHAs that did not adopt waivers. Among the 86 interviews conducted with PHAs that adopted waivers, 12 interviews were with assisted households, including 6 with a Resident Advisory Board member.

3.3.3 Qualitative Data Analysis

After completing the interviews, the researchers conducted a qualitative analysis of the interview data. The researchers used an inductive coding approach focused on identifying concepts and patterns and highlighting key themes within the data (Creswell and Clark, 2016). The researchers imported the interview transcripts into the NVivo qualitative analysis software and assigned characteristics to the transcripts to note the appropriate respondent group. Data analysis was designed to align with the associated research questions.

1. First, the researchers established initial or parent nodes in NVivo based on the predefined research questions and interview guides. These nodes served as the initial framework for organizing the data.

2. Second, the researchers identified and refined more specific codes within each parent node based on a sample of transcripts. Specifically, two qualitative analysts among the researchers independently coded 10 percent of the transcripts.⁶⁶
3. Next, the analysts split the number of transcripts among them and coded all of them. While coding, they remained open to new themes and patterns emerging from the data, creating new nodes to capture these emergent themes.
4. Finally, the researchers conducted a thematic analysis of the data based on the codes and in alignment with the research questions. They combined similar nodes to create broader categories or split larger nodes into more specific sub-nodes as needed. The researchers considered the findings from each of the respondent groups, examined how various perspectives contribute to an understanding of the implementation and outcomes of the CARES Act waivers, and looked for overarching themes and key insights across the respondent groups. The researchers present the findings from this analysis in **chapter 4**.

3.4 Additional HUD Administrative Data Analysis

The researchers explored the potential of using available HUD administrative data (apart from CAWRT data) to measure the impact of select waivers on PHA operations and assisted households. Based on the researchers' review of the Public and Indian Housing (PIH) Notices and discussions with HUD and the National Association of Housing and Redevelopment Officials (NAHRO) subject matter experts, the researchers identified the following waivers as potentially affecting the operations and performance of PHAs—

- Housing Quality Standards (HQS) waivers, including waivers pertaining to initial inspections for new Housing Assistance Payment (HAP) contracts, interim inspections, annual inspections, turnover unit inspections, and replacement unit inspections.
- Increase in Payment Standard During HAP Contract Term waivers.
- Extensions of Voucher Term waivers.
- Public Housing Assessment System (PHAS) waivers.

Following discussions with HUD, the researchers identified two main administrative data sources from HUD that could be used to measure the effects of a subset of CARES Act waivers: the Housing Choice Voucher (HCV) data dashboard and HUD's Financial Data Schedule (FDS). The researchers conducted various statistical analyses to identify patterns in the characteristics of PHAs that adopted waivers and to measure (non-experimentally) the impact of waiver use on select PHA outcomes. These exploratory analyses did not

⁶⁶ This process involved these two analysts carefully reading through the same sample of transcripts. Each analyst created sub-nodes under each parent node or research question based on their interpretation of the text. Next, the analysts met to compare their codes and resolved any differences to ensure uniformity. For quality control purposes, a senior qualitative analyst reviewed the sample transcripts and the reconciled codes. This step helped create a comprehensive and consistent coding framework reflecting both the predetermined categories and emergent themes from the data. This process ensured that the initial coding captured both predefined categories and new insights from the data.

produce statistically significant findings and are documented in Appendix E. Simple cross-tabulations of PHA characteristics and CAWRT data are presented in **chapter 4**.

Chapter 4. Study Findings

This chapter is organized into four sections aligned with the study objectives. First, the researchers examine the implementation process of the Coronavirus Aid, Relief, and Economic Security (CARES) Act waivers, including how public housing agencies PHAs implemented and tracked waivers, the challenges they faced, and the guidance and support they received from HUD. Second, the researchers identify the waivers that were most and least often adopted and examine the characteristics of the PHAs that adopted the waivers and those that did not use the waivers. In the third section, the researchers document the outcomes of the PHAs' selected waivers on PHAs' operations and assisted households. The chapter ends with a discussion of the feedback from PHAs on waivers they would like to see continued, along with their suggestions for improving future waivers and processes. The researchers primarily used data from interviews with PHA leadership, operational staff, and residents, and the updated CARES Act Waiver Reporting Tool (CAWRT) data to prepare this chapter. The team supplemented the findings in this chapter with data from HUD's Housing Choice Voucher (HCV) data dashboard and Financial Data Schedule. See **appendix E** for results from the analysis of HUD's administrative data.

Although all 53 PHAs that adopted the CARES Act waivers were asked each of the questions in the interview guides, many could not answer every question. Interviewees likely experienced recall bias due to a 2-year gap between the implementation of the waivers and the interviews. Some PHAs had significant staff turnover, which impacted their ability to answer specific questions. In other cases, PHA staff simply did not remember their actions or experiences from that time. To address this issue, researchers have indicated the number of PHAs responding to each question throughout the chapter, clarifying the sample size for each specific inquiry.

4.1 Objective 1: Understanding the Implementation of CARES Act Waivers

This section details the implementation process of CARES Act waivers, including the initial pandemic challenges, the impact of the CARES Act on waiver implementation, PHAs' processes for implementing and tracking waivers, the guidance and support PHAs received from HUD, and the challenges PHAs encountered during implementation.

KEY TAKEAWAYS

- One-third of small PHAs were unaware of the availability of HUD waivers before the CARES Act waivers became available.
- The removal of HUD's review and approval process made adopting waivers easier, increasing PHA waiver adoption.
- PHA satisfaction with HUD guidance on CARES Act waivers varied by HUD Regional Office.
- PHAs want to see simple, short, and practical guidance from HUD.

4.1.1 Initial Pandemic Challenges

At the start of the pandemic, PHAs were deeply concerned about keeping their residents and staff safe while maintaining their operations. The transition to social distancing created challenges for PHAs that had previously relied heavily on in-person interactions. One PHA operations staff member explained, “Prior to COVID, everything was face-to-face. Face-to-face interviews with our clients here at the office...inspectors going out to visit the home to inspect the unit...and with COVID, we stopped doing that.” This sudden shift affected critical functions like voucher briefings, maintenance, inspections, and collecting eligibility documents, which had previously depended on in-person interactions.

Many PHAs, lacking the infrastructure for virtual operations, faced difficulties adapting quickly. Forty PHAs discussed these pandemic-related challenges in their interviews (see **exhibit 4.1**). One-half of these PHAs reported struggling to quickly convert to virtual operations, partly due to financial and logistical barriers. These barriers required PHAs to make substantial investments in technology and staff training to ensure continued service delivery during the pandemic. One PHA leadership member noted, “We had to purchase technology to upgrade things. Initially, we didn’t have the additional admin funds for COVID... When I started, we had no reserves. We had very, very little, but we had to do some investments to get even more technologically updated.”

Not all PHA operations can be done virtually. In fact, 19 PHAs reported challenges with inspections and maintenance. Operations staff from one PHA stated, “We weren’t going into occupied homes unless it was a health and safety emergency. Even that was still the challenge, depending on the individual and their comfort level.”

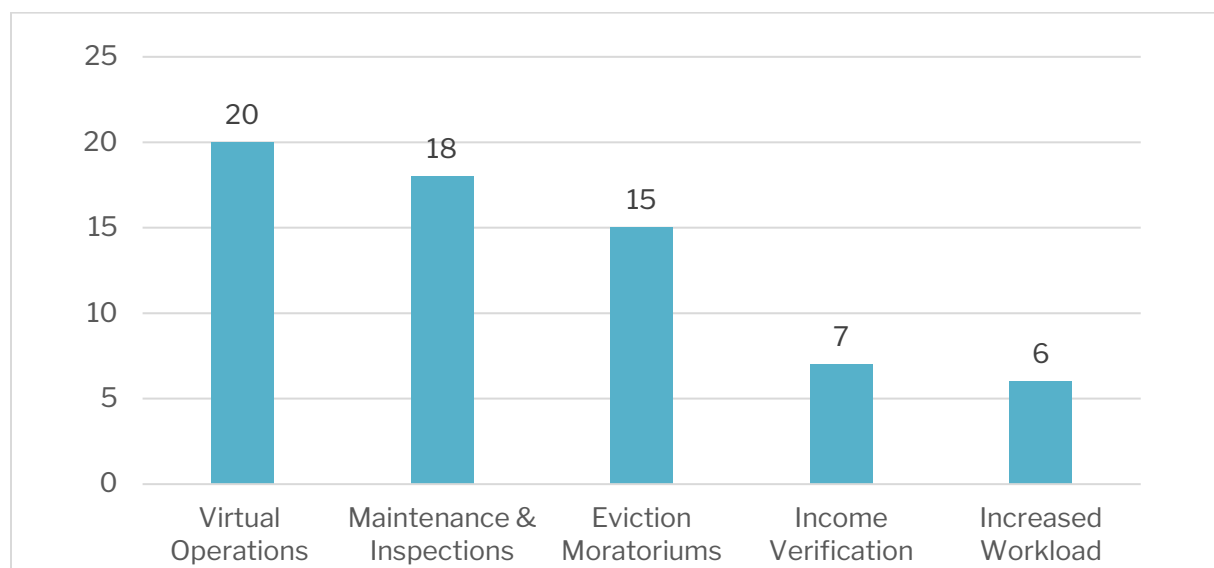
Staff from seven PHAs discussed income verification as a particular challenge. PHA leadership also reported challenges in this regard, with one PHA leader noting, “Social security verifications were impossible to get at the time. A lot of employers weren’t providing verifications of employment.” Workplaces were closed, and other government agencies were too overburdened to provide the required documentation. These challenges point to the impracticality of continuing to operate without waivers. In addition, 14 PHAs also mentioned tenant income reduction. As discussed previously, in many cases, it was difficult to obtain the documents necessary for recertification. According to leadership from one PHA, income changes created “a workload increase...for all of our housing specialists as people lost their jobs and then regained [them].” Housing specialists had to complete new income certifications for each change.

Meanwhile, six PHAs reported struggling with staffing, further compounding the effects of increased workloads. Leadership from one PHA noted, “A lot of people retired. I could tell you that was tough... I had people working for the agency for 40, 30, 20 years, and they all retired.”

At the same time, 15 PHAs reported that eviction moratoriums and other local government mandates impacted their operations. Five PHAs went on to say that some of their tenants stopped paying rent as a result. Three of the five ran only public housing programs, meaning they did not run HCV or other programs. These three PHAs were extra small, and non-

payment had a big impact on their operations. Leadership from one PHA reported, “Then at the end, they racked up this huge rent, and then that affects our accounting at the fiscal year-end. That affects your score.” The PHA did not specify which score they were referring to but were likely referring to low Public Housing Assessment System (PHAS) scores, which can lead to funding cuts, increased HUD oversight, and low prioritization for future funding.

Exhibit 4.1 | Public Housing Agencies (PHA)-Reported Pandemic Challenges (n = 40)



Source: The researchers' interviews with PHAs, October 2023-March 2024

4.1.2 Impact of CARES Act Authorization on Waiver Implementation

This section discusses the effect of the CARES Act, including the removal of HUD's review and approval process, on PHA waiver adoption. The researchers will compare PHA adoption of pre-CARES Act waivers with PHA adoption of CARES Act waivers.

Pre-CARES Act Waivers

Staff from 23 PHAs reported that they had not adopted waivers prior to the CARES Act. From this group, staff from 11 PHAs indicated they had not felt the need for the waivers. In contrast, five PHAs reported that the process for applying for waivers was too difficult to justify their adoption. Operations staff from one PHA expressed this sentiment, stating, “I felt they were too cumbersome and time-consuming for the benefit. I weighed the benefit versus my involvement and the board's involvement, and I found not requesting to be more beneficial.”

Seven small and extra-small PHAs did not know that they could apply for waivers prior to the CARES Act. Nine PHAs had previously requested waivers to delay annual inspections, and one had requested to carry forward the most recent Section Eight Management Assessment Program (SEMAP) score on record. A few (four) PHAs also reported applying for waivers to increase their payment standard amounts. However, these applications were

likely an exception as part of a payment standard request rather than waivers, which follow a different process.⁶⁷

Change in Waiver Adoption After the CARES Act

The impact of the CARES Act on the waiver adoption process was discussed by 29 PHAs, with 23 reporting that the simplified waiver review and approval process made it faster and easier to adopt waivers. Leadership from one PHA described how the streamlined process allowed them to quickly implement the decision to adopt the waivers that directly benefited their residents: “We were able to make the decision internally that made sense for our PHA; roll it out basically next day to the families. Our families benefited from not having a delay in the time we decided to implement them to when they felt the benefits of them.”

The removal of the approval requirement also enabled PHAs to implement more waivers than before. As leadership from one PHA reported, “The fact that we did not have to have that approval allowed us to implement more waivers than what we would have.” Three other PHAs echoed this statement.

Operations staff from another PHA noted the longer-term flexibility provided by the waivers, stating, “It was great to have the option of applying these waivers because there are situations that would arise [later on] that would allow us to be a little more flexible.”

4.1.3 Process for Implementing and Tracking CARES Act Waivers

During the interviews, 49 PHAs discussed their implementation process. PHAs did not have implementation requirements to meet, but they still reported similar tendencies. The typical implementation process was for staff to review the Public and Indian Housing (PIH) Notices, determine which waivers made sense, inform their boards of a decision, and then seek and receive approval (37 PHAs). Six small and extra-small PHAs went beyond informing their board and involved them in the decisionmaking process. No large or medium PHAs involved their boards in the decisionmaking process. Nearly one-half of the PHAs also engaged external stakeholders. For example, 19 PHAs engaged Resident Advisory Boards (RABs), 14 PHAs engaged their HUD field office, and 12 PHAs engaged other PHAs. Small, medium, and large PHAs all engaged in this external review practice.

During the interviews, 50 PHAs discussed the factors that led them to implement waivers (see **exhibit 4.2**). Twenty-nine reported that their biggest consideration was the health and safety of residents and staff. Twenty PHAs reported considering uncertainty about the future when deciding which waivers to implement. These PHAs tended to adopt all available waivers “just in case” they might need them later. Another group of 22 PHAs expressed concern about the impact of applying for waivers on their future compliance and associated scores. For these PHAs, concern for future compliance prevented them from fully utilizing all the available waiver options.

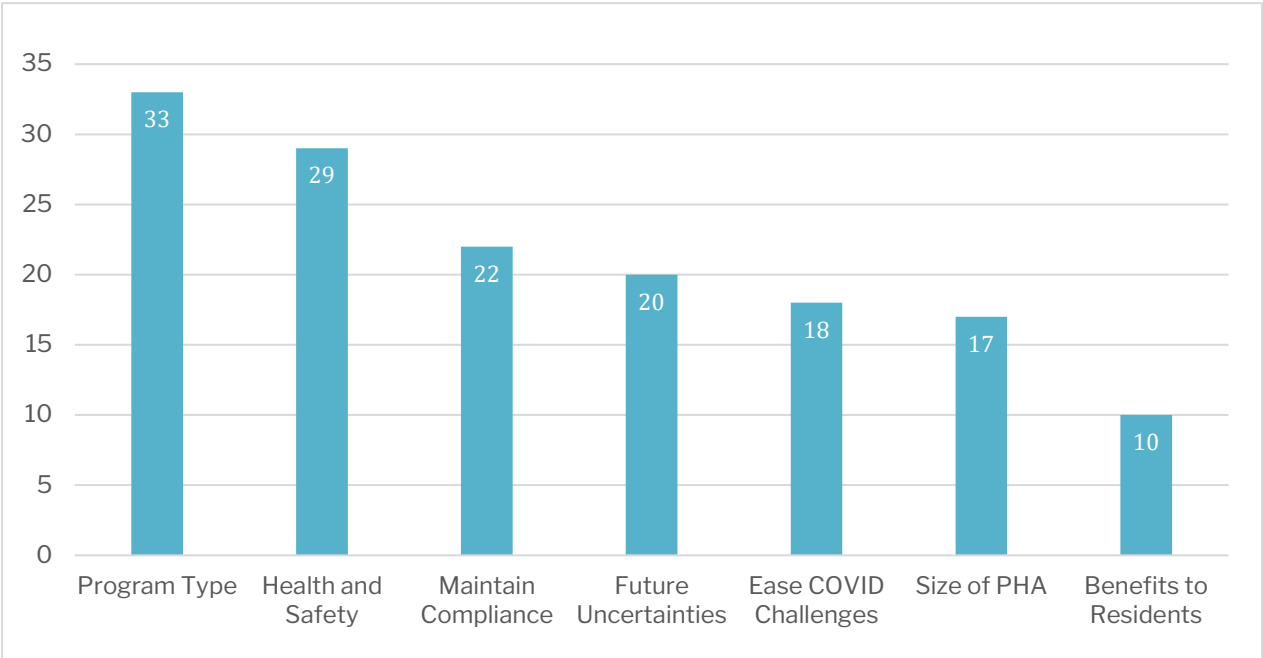
These PHAs tried to maintain their operations and deadlines as much as possible while

⁶⁷ Codified in 24 CFR 982.405(b) and 5 CFR 983.103(1), although prior to 2020 the provisions were codified elsewhere.

utilizing the fewest waivers feasible and leaning on those they did adopt as little as possible. For example, leadership from one PHA noted, “Waiver doesn’t mean it’s waived forever. It means we’re just waiving the time... We still kept up with our annuals like we were supposed to because we were not going to have to catch up later.”

Many small and rural PHAs reported that their size and location influenced their decisions to adopt the waivers. Leadership from a small PHA explained that their smaller size reduced the need to adopt as many waivers as larger agencies, “Maybe just in the sense that we’re a little bit smaller of a PHA, so maybe we didn’t have to utilize as many waivers as maybe a larger agency would have.”

Exhibit 4.2 | Considerations for Adopting Waivers (n = 50)



PHA = public housing agencies.
Source: The researchers’ interviews with PHAs, October 2023-March 2024

Post-implementation, 15 PHAs discussed informing residents or landlords of the changes. Six PHAs also began planning for waiver expiration immediately after adoption. Many PHAs used Attachment 1 of the PIH Notices (29 PHAs) to track their waivers. Attachment 1 is a chart that HUD included in the waiver notices. It summarizes the waivers authorized under each notice and the availability period for each. PHAs recorded the waivers they applied and their date of adoption. PHAs also used internal documents (30 PHAs) like annual plans, board reports, and administrative offices to track their waivers. Several PHAs used a combination of both PIH attachments and internal documents to track their waivers. However, four PHAs reported struggling to manage the frequently changing expiration dates. Leadership from a medium-sized PHA shared their experience, stating, “We spent a lot of time trying to quickly get ready to pivot out [of the waivers] and then would get extensions on the waivers like very short notice to their current expiration dates.” As a result, these PHAs often had to reverse course, which created operational challenges as staff repeatedly adjusted to fluctuating waiver timelines. Leadership from the same PHA

noted, “We spent time retraining staff to be like, ‘We’re coming out of this waiver,’ and then would be like, ‘No, never mind, the waiver is extended again. Let’s undo what we just got ready to change back again.’”

4.1.4 HUD Guidance and Support

The guidance and support HUD provided for implementing CARES Act waivers was discussed by 44 PHAs. Many (23) PHAs pointed to PIH Notices and other website guidance. PHAs (24) also reported attending conferences and meetings on either the national or local level.

The researchers asked PHAs about the types of guidance they received from HUD. However, many PHAs chose to provide additional feedback on the quality of the guidance and support they received. Of the 22 PHAs that discussed the quality of HUD guidance and resources, 13 PHAs were satisfied with the guidance they received, but 9 PHAs expressed a desire for more guidance. The level of support PHAs felt from HUD was often tied to the responsiveness of their local and regional field offices. PHAs that were satisfied noted regular and proactive communication from the regional offices. For example, leadership from one PHA mentioned, “We had weekly training where [our local HUD office] would call in and guide us along the way. Our financial analyst and public housing director at our local HUD office were aggressive in providing information...we might've been hesitant to even [adopt the waivers] had they not called and said this [program] is going to be beneficial, and HUD's behind it, and they're going to support it.”

These PHAs also felt their local offices were able to meaningfully and accurately address their questions. Leadership and operations staff from one PHA explained, “We had discussions around some of the challenges...[and] how best to implement those waivers. I felt confident [about] the suggestions for improvements [that] were communicated [by] the regional office.”

In contrast, seven out of nine PHAs that wished for more guidance often had unresolved questions after speaking with local and regional offices. Leadership from one PHA reported that, because of the lack of clarity from their regional office, “Their confidence level [to act] was always in question.” They worried about “whether [their decisions] were compliant or not compliant, whether [they] were safe or not safe.” PHAs’ unanswered questions led to a desire for more responsive and pragmatic support from HUD.

PHAs looking for further support often discussed waivers and collaborated on an adoption strategy with other PHAs. They also looked to industry organizations like the National Association of Housing and Redevelopment Officials (NAHRO), state housing authority associations, and the Public Housing Authorities Directors Association (PHADA) to augment HUD support. For example, leadership from one PHA noted, “It would be fantastic if HUD could start to put out policy guides [on] actual implementation, bigger than just, ‘This [policy guide] is the regulation change’... As an industry, we rely on groups like Nan McKay to translate the HUD-speak into a workable procedure or document that we can then implement and share with our tenants.”

This need for practical, easily implemented guidance underscores a broader concern shared by many PHAs about the complexity of HUD's communications. More than one-half of the PHAs wanting more guidance also sought clearer communication, specifically through shorter, more straightforward guidance documents containing less jargon. Leadership from one PHA commented on the complexity of the PIH notices, stating, "The language that they put out. Some of it is not always very intuitive... You may have to read it several times before it makes sense."

Leadership from another PHA highlighted the challenge of navigating complex regulations during critical moments, stating, "Well, look at the waiver document as an example. It's bullet points and it refers back to the Code of Federal Regulation and the citations. Certainly, we can read all of that, but you have to think about it in terms of our house is on fire, and you're giving me a bullet point list, and now I need to go back and read a Code of Federal Regulation that may or may not make sense or answer my question."

4.1.5 Waiver Implementation Challenges

When discussing implementation challenges, most PHAs referred to operational issues related to the pandemic. Of the 40 responding PHAs, only 23 identified challenges specific to CARES Act waivers. A common implementation challenge was PHAs' adoption of technology. Ten PHAs indicated that their tenants struggled to use technology, and six PHAs noted that their organizations faced internal difficulties with adapting to virtual processes. An operations staff member from one PHA explained the challenges tenants faced in submitting documents electronically: "Trying to get the clients to be able to take a legible picture of their income documentation and send it to us, that was almost impossible. They might take a picture of their paycheck stub, and we only got the middle of it, so now we couldn't even calculate their income."

Seven PHAs reported struggling with unreliable self-certifications, which led to housing quality issues and additional work for PHA staff needing to correct income discrepancies. Unreliable income self-certifications led to more administrative work. As leadership from one PHA noted, "It opened up a lot more work on the back end for us... We're doing a lot of work still cleaning up income discrepancies."

An operations staff member from one PHA highlighted the problems encountered during home inspections, "People did [inspection] self-certifications—2020 to 2022—and we're now getting back into the home. It is horrid, horrendous. I have this one [tenant] right now; I don't know if we're going to be able to salvage it because she's a hoarder." Landlords, who were often responsible for certifying the condition of units, also contributed to the problem. An operations staff member from another PHA explained, "The landlords are like, 'Well, you did inspections. I didn't know that there was a roach infestation.' The landlords were the ones signing off on the certifications, saying, 'Yes, the unit is up to date, so on and so forth.'"

Another seven PHAs, all large- and medium-sized, struggled with unanswered implementation questions. For example, leadership and operations staff from one PHA noted, "Obviously, we'll implement this waiver going forward, but what do we do about all these transactions that are in process that got started prior to the pandemic?... Where

somebody had provided their first round of documentation, but they had more to provide us, and now we had this waiver where we could just say, ‘Fine, we’re going to self-certify it.’”

Although the CARES Act waivers aided PHAs in continuing their operations, they did not solve other pandemic challenges, such as housing shortages and rapidly rising rents. Twenty-eight PHAs spoke about ongoing pandemic challenges as opposed to challenges with the waivers. When asked about implementation challenges, a leader and operations staff member from one PHA noted, “I don’t think [the waivers themselves were challenging], not in [their] implementation... COVID itself was extremely challenging.”

4.2 Objective 2: Identify Trends and Characteristics Among PHAs

In this section, the researchers identify the types of CARES Act waivers that the PHAs adopted more frequently (or did not adopt at all) and discuss the PHA characteristics that may have influenced the likelihood of PHAs adopting specific waivers. These findings are based on the analysis of the updated CAWRT data. All percentages are based on the 1,644 PHAs that adopted waivers and 1,570 PHAs that did not adopt any waivers.

KEY TAKEAWAYS

- Large and medium PHAs adopted waivers at higher rates than small PHAs.
- The Northeast and the Far West and Beyond⁶⁸ regions were most likely to adopt waivers, whereas the Southwest and Midwest were less likely to adopt waivers.
- PHAs with only public housing and no HCVs were the least likely to adopt waivers.
- PHAs that did not adopt waivers cited reasons such as perceived lack of necessity, the temporary nature of waivers, and existing workarounds.
- The most adopted waivers were the Housing Quality Standards Quality Control Inspection, Oral Briefing, Term of Voucher, and Initial Inspections Requirements waivers. These waivers had adoption rates above 65 percent.
- The least commonly adopted waivers were those in the Moderate Rehabilitation and Mainstream Voucher categories. These waivers had adoption rates below 8 percent.

4.2.1 Most and Least Adopted CARES Act Waivers

The CARES Act provided seven types of waivers, encompassing 68 specific waivers, as detailed in **exhibit D.1**. The researchers summarize the waivers that were most and least adopted by PHAs in **exhibit 4.3** and **exhibit 4.4**, respectively. Across all waiver categories, the most adopted waiver was the Housing Quality Standards (HQS) Quality Control Inspections waiver, with an adoption rate of 75.6 percent. Conversely, the least adopted waiver was the Adjustment of Utility Allowance waiver under the Moderate Rehabilitation

⁶⁸ This term refers to a region that comprises HUD Regions 9 and 10, covering Arizona, California, Hawaii, Nevada, Alaska, Idaho, Oregon, and Washington.

waivers category, with an adoption rate of only 4.3 percent.^{69,70} The two least adopted categories, Moderate Rehabilitation and Mainstream Voucher waivers, are for two uncommon programs. As a result, the researchers would expect to see fewer instances of adoption in these categories. The researchers highlight the most and least adopted waivers within each category in the following paragraphs.

Public Housing and HCV Program Waivers: Within this category, the top two most adopted waivers were the Family Income and Composition: Annual Reexamination; Income Verification Requirements waiver at 61.8 percent and the Family Income and Composition: Interim Reexaminations waiver at 58.7 percent. On the other hand, the least adopted waivers in this category were the Eligibility Determination: Social Security Number and Citizenship Verification waiver at 23.2 percent and the Waiting List: Opening and Closing; Public Notice waiver at 25.4 percent.

Housing Quality Standards (HQS) Inspection Waivers: For this category, the most adopted waivers were the HQS Quality Control Inspections waiver, adopted by 75.6 percent of PHAs, followed by the Initial Inspection Requirements waiver at 66 percent and the HQS Inspection Requirement: Biennial Inspections waiver at 60.4 percent. The least adopted waivers in this category were the Homeownership Option: Initial HQS Inspection waiver at 16.8 percent and the Project-Based Voucher (PBV) HAP Contract: HQS, and Inspections to Add or Substitute Units waiver at 18.4 percent.

Housing Choice Voucher Waivers: Among this category, the top three waivers were the Information When Family is Selected: PHA Oral Briefing waiver at 67.1 percent, the Term of Voucher: Extensions of Term waiver at 66.5 percent, and the Administrative Plan waiver at 55.2 percent. The waivers with the lowest adoption rates in this category were the Family Unification Program (FUP): Length of Assistance for Youth waivers at 9.2 percent and the Project Based Voucher (PBV) and Enhanced Voucher (EV) Provisions on Under-Occupied Units waiver at 10.2 percent.

Public Housing Waivers: In this category, the most frequently adopted waivers were the Public Housing Agency Annual Self-Inspections waiver at 41.2 percent, the Adoption of Tenant Selection Policies waiver at 37 percent, and the Tenant Notifications for Changes to Project Rules and Regulations waiver at 36.4 percent. The least adopted were the

⁶⁹ The CAWRT data recorded the adoption status for each of the CARES Act waivers listed in **exhibit D.1**. Each waiver's adoption by a PHA is indicated with "Yes" for adoption or "No" for non-adoption. The dataset also includes cases of missing data, where the adoption status is unknown. To calculate the adoption rate for each waiver type accurately, these missing values were excluded from the analysis.

⁷⁰ PHAs were only required to report on one waiver from the PHAS, SEMAP, and Uniform Financial Reporting Standards waivers category (11c: Uniform Financial Reporting Standards: Filing of Financial Reports; Reporting Compliance Dates) and one waiver from the Other Waivers and Administrative Relief waivers category (12a: PHA Reporting Requirements on HUD Form 50058). Within the CAWRT Dashboard, these two waivers (11c and 12a) have been combined under the Other Waivers and Administrative Relief waivers category. Consequently, the CAWRT dashboard does not report data on other waivers under these two categories, such as PHAS, SEMAP, and Community Service and Self-Sufficiency Requirement (CSSR) Suspension. Thus, the analysis conducted using the CAWRT data does not include these waivers.

Designated Housing Plan Renewals waiver at 9.4 percent and the Total Development Costs waiver at 13.4 percent.

Public Housing Assessment System (PHAS), Section Eight Management Assessment Program (SEMAP), and Uniform Financial Reporting Standards Waivers: In this category, the most adopted waiver was the Uniform Financial Reporting Standards: Filing of Financial Reports; Reporting Compliance Dates waiver at 35.8 percent. The PHA Reporting Requirements on HUD Form 50058 waiver was the least adopted at 35 percent.

Moderate Rehabilitation Program Waivers: In this category, the most adopted waivers were the PHA Inspection Requirement: Annual Inspections waiver at 6.9 percent, the Family Income and Composition: Annual Reexamination; Income Verification Requirements waiver at 6.6 percent, and the Family Income and Composition: Interim Reexaminations waiver at 6.6 percent. The least adopted waiver in this category was the MR-6 Adjustment of Utility Allowance waiver at 4.3 percent. The moderate rehabilitation program is a legacy program that most PHAs do not administer, and therefore, this set of waivers would not apply to most PHAs.

Mainstream Voucher Waivers: In this category, the top three waivers were the Age Eligibility to Enter HAP Contract Statutory Authority waiver at 7.8 percent, the Initial Lease Term waiver at 7.6 percent, and the Criminal Background Screening waiver at 6 percent. Only 648 out of 3,300 PHAs have mainstream voucher programs; therefore, this set of waivers would not apply to most PHAs.

Exhibit 4.3 | Most Adopted Waivers by Type

Waiver Categories	Waiver Sub-categories	Overall Adoption Rate (among PHAs that Adopted at least One Waiver) (%)	Adoption Rate within Waiver Categories ⁷¹ (%)
Public Housing (PH) and Housing Choice Voucher (HCV) Program Waivers	PH and HCV-3: Family Income and Composition: Annual Reexamination; Income Verification Requirements waiver	61.8	67.0
	PH and HCV-4: Family Income and Composition: Interim Reexaminations waiver	58.7	63.6
	HQS-9: HQS C	75.6	84.0

⁷¹ “Adoption rate within waiver categories” refers to the percentage of PHAs that adopted each waiver by comparison to others within that same waiver category.

Waiver Categories	Waiver Sub-categories	Overall Adoption Rate (among PHAs that Adopted at least One Waiver) (%)	Adoption Rate within Waiver Categories ⁷¹ (%)
Housing Quality Standards (HQS) Inspection Waivers	HQS-1: Initial Inspection Requirements waiver	66.0	73.3
	HQS-5: HQS Inspection Requirement: Biennial Inspections waiver	60.4	67.0
	HQS-6: HQS Interim Inspections waiver	60.2	66.9
HCV Waivers	HCV-2: Information When Family is Selected: PHA Oral Briefing waiver	67.1	78.4
	HCV-3: Term of Voucher: Extensions of Term waiver	66.5	77.6
	HCV-1: Administrative Plan waiver	55.2	64.4
Public Housing Waivers	PH-12: Public Housing Agency Annual Self-Inspections waiver	41.2	56.3
	PH-4: Adoption of Tenant Selection Policies waiver	37.0	50.6
	PH-10: Tenant Notifications for Changes to Project Rules and Regulations waiver	36.4	12.8
Public Housing Assessment System (PHAS), Section Eight Management Assessment Program (SEMAP), and Uniform Financial Reporting Standards Waivers	11c: Uniform Financial Reporting Standards: Filing of Financial Reports; Reporting Compliance Dates waiver	35.8	84.9
	12a: Public Housing Agencies (PHA) Reporting Requirements on HUD Form 50058 waiver	35.0	82.9
Moderate Rehabilitation (MR) Program Waivers	MR-5: PHA Inspection Requirement: Annual Inspections waiver	6.9	91.9

Waiver Categories	Waiver Sub-categories	Overall Adoption Rate (among PHAs that Adopted at least One Waiver) (%)	Adoption Rate within Waiver Categories ⁷¹ (%)
	MR-3: Family Income and Composition: Interim Reexaminations waiver	6.6	87.1
Mainstream (MS) Voucher Waivers	MS-3: Age Eligibility to Enter HAP Contract Statutory Authority waiver	7.8	69.6
	MS-1: Initial Lease Term waiver	7.6	67.9

Source: CARES Act Waiver Reporting Tool (CAWRT) Data

Exhibit 4.4 | Least Adopted Waivers by Type

Waiver Categories	Waiver Sub-categories	Overall Adoption Rate (among PHAs that Adopted at least One Waiver) (%)	Adoption Rate within Waiver Categories (%)
Public Housing (PH) and Housing Choice Voucher (HCV) Program Waivers	PH and HCV-6: Family Self-Sufficiency (FSS) Contract of Participation: Contract Extension waiver	31.6	34.3
	PH and HCV-7: Waiting List: Opening and Closing; Public Notice waiver	25.4	27.5
	PH and HCV-9: Eligibility Determination: Social Security Number and Citizenship Verification waiver	23.2	25.1
Housing Quality Standards (HQS) Inspection Waivers	HQS-7: PBV Turnover Unit Inspections waiver	25.6	28.5
	HQS-8: PBV HAP, Contract: HQS, and Inspections to Add or Substitute Units waiver	18.4	20.5
	HQS-11: Homeownership Option: Initial HQS Inspection waiver	16.8	18.7

Waiver Categories	Waiver Sub-categories	Overall Adoption Rate (among PHAs that Adopted at least One Waiver) (%)	Adoption Rate within Waiver Categories (%)
HCV Waivers	HCV-13: Homeownership: Maximum Term of Assistance waiver	10.4	12.1
	HCV-15: Project-Based Voucher (PBV) and Enhanced Voucher (EV) Provisions on Under-Occupied Units waiver	10.2	11.9
	HCV-11: Family Unification Program (FUP): Length of Assistance for Youth waiver	9.2	10.7
Public Housing Waivers	PH-3: Cost and Other Limitations: Types of Labor waiver	18.6	25.5
	PH-2: Total Development Costs waiver	13.4	18.3
	PH-11: Designated Housing Plan Renewals waiver	9.4	12.8
Public Housing Assessment System (PHAS), Section Eight Management Assessment Program (SEMAP), and UNIFORM Financial Reporting Standards Waivers	12a: Public Housing Agencies (PHA) Reporting Requirements on HUD Form 50058 waiver	35.0	82.9
Moderate Rehabilitation (MR) Program Waivers	MR-6: Adjustment of Utility Allowance waiver	4.3	57.3
Mainstream (MS) Voucher Waivers	MS-2: Criminal Background Screening waiver	6.0	53.3

Source: CARES Act Waiver Reporting Tool (CAWRT) Data

4.2.2 Waiver Adoption by Moving to Work Status

The Moving to Work (MTW) program is a demonstration program for PHAs seeking to improve cost-effectiveness, incentivize households to become self-sufficient, and increase housing choices for low-income families. MTW agencies (PHAs participating in the MTW

program) have increased flexibilities compared with non-MTW agencies and may seek exemption from many program rules. Prior to 2015, 39 PHAs were participating in this program. In December 2015, under the 2016 Consolidated Appropriations Act, Congress authorized the expansion of the MTW program to 100 new agencies. PHAs began applying for the MTW expansion cohorts in 2018. However, HUD did not announce the 100 selected agencies until 2021 and beyond. As a result, MTW expansion agencies would not yet have had this program designation when adopting CARES Act waivers. In addition to the difference in timing, the initial MTW and the MTW expansion programs operate under different agreements with HUD. The 100 PHAs that are part of the MTW expansion are governed by the *Operations Notice for the Expansion of the Moving to Work Demonstration Program*,⁷² which established the requirements and waivers available under the MTW Expansion, whereas the initial 39 PHAs negotiated individual agreements with HUD. As a result of the PHAs' differing agreements and lengths of time participating in the program, the researchers have chosen to separate the two groups in the analysis.

As shown in **exhibit 3.2**, the updated CAWRT data provided information on several characteristics of PHAs, including MTW status. **Exhibit 4.5** shows waiver adoption rates by MTW status for the 18 most adopted waivers listed in **exhibit 4.3**. This data illustrates that MTW PHAs were generally more inclined to adopt waivers of all types when compared with their non-MTW counterparts, with the exceptions of the Initial Inspection Requirements waiver and the Tenant Notifications for Changes to Project Rules and Regulations waiver.

Furthermore, **exhibit 4.5** indicates that MTW expansion PHAs also have higher adoption rates than PHAs in the non-MTW category for most waiver types. Exceptions to this pattern included: the Family Income and Composition: Interim Reexaminations waiver, the Initial Inspection Requirements waiver, the HQS Inspection Requirement: Biennial Inspections waiver, the Public Housing Agency Annual Self-Inspections waiver, Adoption of Tenant Selection Policies waiver, the PHA Reporting Requirements on HUD Form 50058 waiver, and the PHA Inspection Requirement: Annual Inspections waiver. **Exhibit D.2** in the appendix details the adoption rates by MTW status for other waiver types.

⁷² <https://www.federalregister.gov/documents/2020/08/28/2020-18152/operations-notice-for-the-expansion-of-the-moving-to-work-demonstration-program>

Exhibit 4.5 | Waiver Adoption by Moving to Work (MTW) Status

Waiver Categories	Waiver Sub-categories	Non-MTW (N= non-MTW PHAs that Adopted Waivers) (%)	MTW (N= Initial MTW PHAs that Adopted Waivers) (%)	MTW Expansion (N= MTW Expansion PHAs that Adopted Waivers) (%)
Public Housing (PH) and Housing Choice Voucher (HCV) Program Waivers	PH and HCV-3: Family Income and Composition: Annual Reexamination; Income Verification Requirements waiver	61.3	79.5	68.8
	PH and HCV-4: Family Income and Composition: Interim Reexaminations waiver	58.4	74.4	50.0
Housing Quality Standards (HQS) Inspection Waivers	HQS-9: HQS Quality Control Inspections waiver	75.4	81.6	76.9
	HQS-1: Initial Inspection Requirements waiver	66.5	55.3	53.8
	HQS-5: HQS Inspection Requirement: Biennial Inspections waiver	60.0	76.3	53.8
	HQS-6: HQS Interim Inspections waiver	59.7	76.3	61.5
HCV Waivers	HCV-2: Information When Family is Selected: PHA Oral Briefing waiver	66.6	84.2	69.2
	HCV-3: Term of Voucher: Extensions of Term waiver	66.1	76.3	69.2
	HCV-1: Administrative Plan waiver	55.0	57.9	61.5
Public Housing Waivers	PH-12: Public Housing Agency Annual Self-Inspections waiver	41.3	44.1	25.0
	PH-4: Adoption of Tenant Selection Policies waiver	36.8	47.1	33.3
	PH-10: Tenant Notifications for Changes to Project Rules and Regulations waiver	36.6	29.4	41.7

Waiver Categories	Waiver Sub-categories	Non-MTW (N= non-MTW PHAs that Adopted Waivers) (%)	MTW (N= Initial MTW PHAs that Adopted Waivers) (%)	MTW Expansion (N= MTW Expansion PHAs that Adopted Waivers) (%)
Public Housing Assessment System (PHAS), Section Eight Management Assessment Program (SEMAP), and Uniform Financial Reporting Standards Waivers	11c: Uniform Financial Reporting Standards: Filing of Financial Reports; Reporting Compliance Dates waiver	35.8	35.9	37.5
	12a: PHA Reporting Requirements on HUD Form 50058 waiver	34.8	43.6	31.3
Moderate Rehabilitation (MR) Program Waivers	MR-5: PHA Inspection Requirement: Annual Inspections waiver	6.7	17.9	6.3
	MR-3: Family Income and Composition: Interim Reexaminations waiver	6.2	23.1	6.3
Mainstream Voucher (MS) Waivers	MS-3: Age Eligibility to Enter HAP Contract Statutory Authority waiver	7.4	23.1	12.5
	MS-1: Initial Lease Term waiver	7.4	15.4	12.5

Source: CARES Act Waiver Reporting Tool (CAWRT) Data

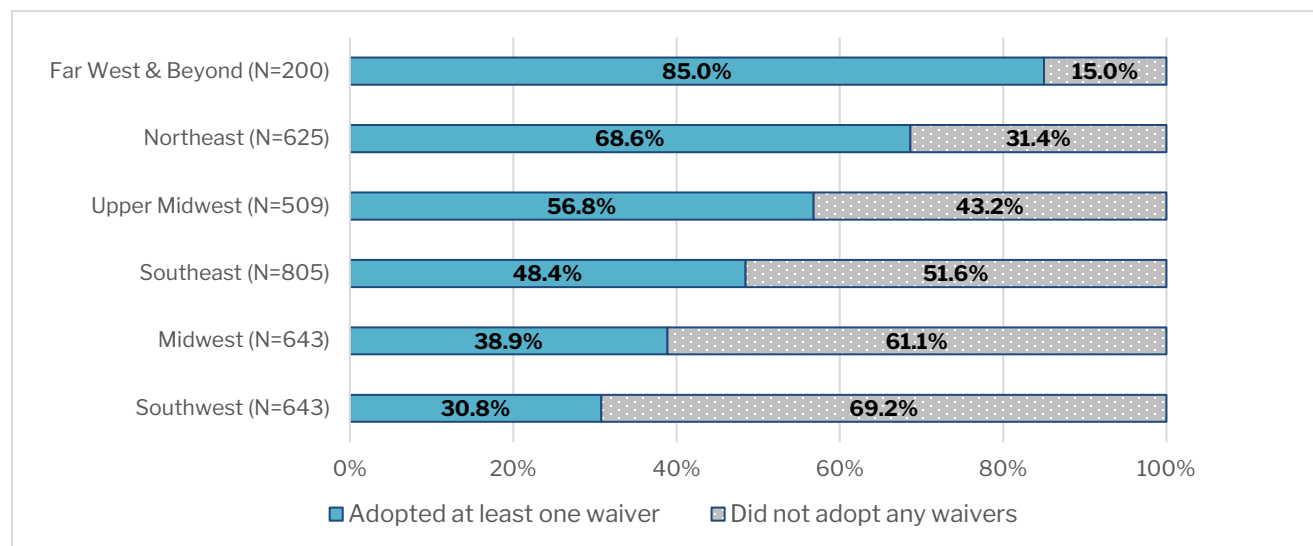
4.2.3 Characteristics of PHAs by Adoption Status of CARES Act Waivers

To examine the characteristics of PHAs that adopted any CARES Act waivers and those that did not, the researchers first produced descriptive statistics to examine the distribution of waiver adoption/declination across four characteristics, presenting the results using bar charts (**exhibits 4.6–4.9**). The researchers then employed a logistic regression model to examine characteristics that are significantly different between PHAs that adopted waivers and PHAs that did not adopt any waivers. The researchers highlight the key findings from this model and summarize the findings in **exhibit 4.10**.

Geographic Region: **Exhibit 4.6** compares waiver adoption/declination across six geographic regions. The graphic highlights that the Far West and Beyond region leads with

the highest waiver adoption rate at 85 percent, followed by the Northeast and Upper Midwest regions, where adoption rates stand at 68.6 percent and 56.8 percent, respectively. In contrast, the Southwest region offers the lowest adoption rate of only 30.8 percent.

Exhibit 4.6 | Public Housing Agencies (PHAs)' Adoption of CARES Act Waivers by Region

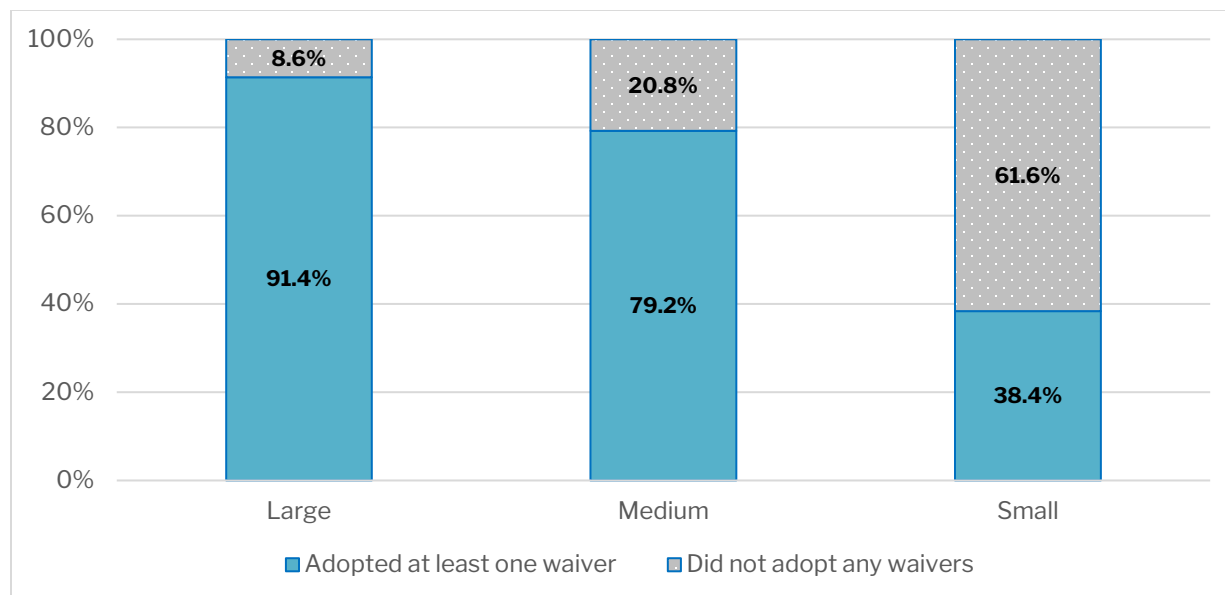


Note: Differences between PHAs that adopted waivers and PHAs that did not adopt waivers by region were statistically significant based on a chi-square test.

Source: CARES Act Waiver Reporting Tool (CAWRT) Data

PHA Size: Exhibit 4.7 illustrates waiver adoption/declination by PHA size.⁷³ It shows that large PHAs are more likely to adopt waivers, with the highest waiver adoption rate at 91.4 percent. Small PHAs, however, offer a different trend, with only 38.4 percent of PHAs adopting waivers.

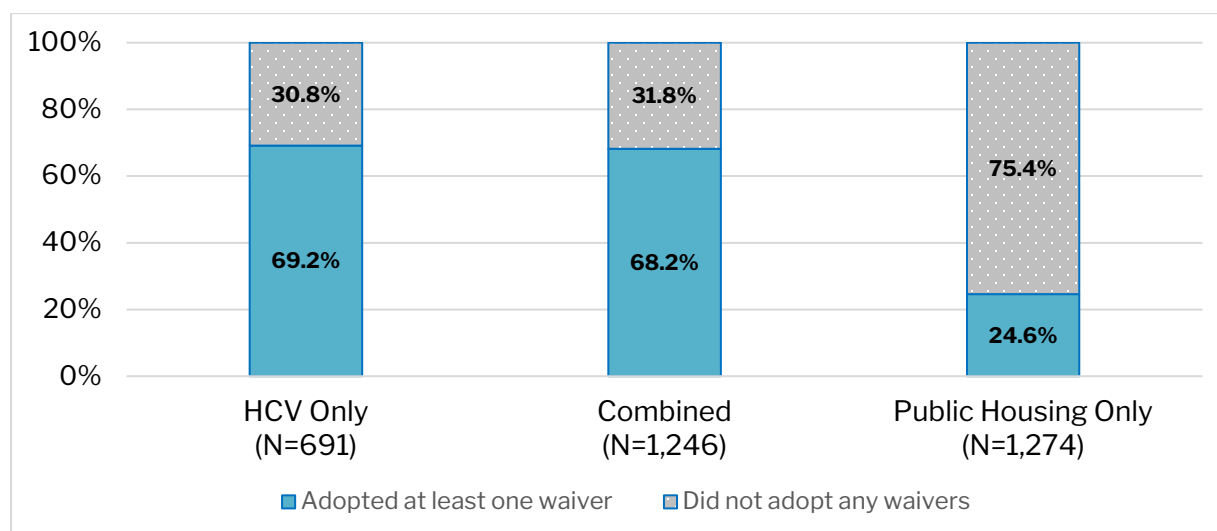
⁷³ The CAWRT data includes information on the size of each PHA, categorized as extra-large, large, medium, small, and extra-small. Due to the limited number of PHAs that fall into the extra-large category, 2M Research consolidated the extra-large and large sizes into one group and combined the extra-small and small categories into another group.

Exhibit 4.7 | Public Housing Agencies (PHAs)' Adoption of CARES Act Waivers by Size

Note: Differences between PHAs that adopted waivers and PHAs that did not adopt waivers, based on PHA size, were statistically significant based on a chi-square test.

Source: CARES Act Waiver Reporting Tool (CAWRT) Data

Program Types: Exhibit 4.8 presents waiver adoption/declination rates by their program types. The data reveal that PHAs with HCV-only programs and combined programs have similar adoption rates, at 69.2 percent and 68.2 percent, respectively. In contrast, PHAs that manage public housing-only programs have a substantially lower waiver adoption rate of only 24.6 percent.

Exhibit 4.8 | Adoption of CARES Act Waivers by Program Type

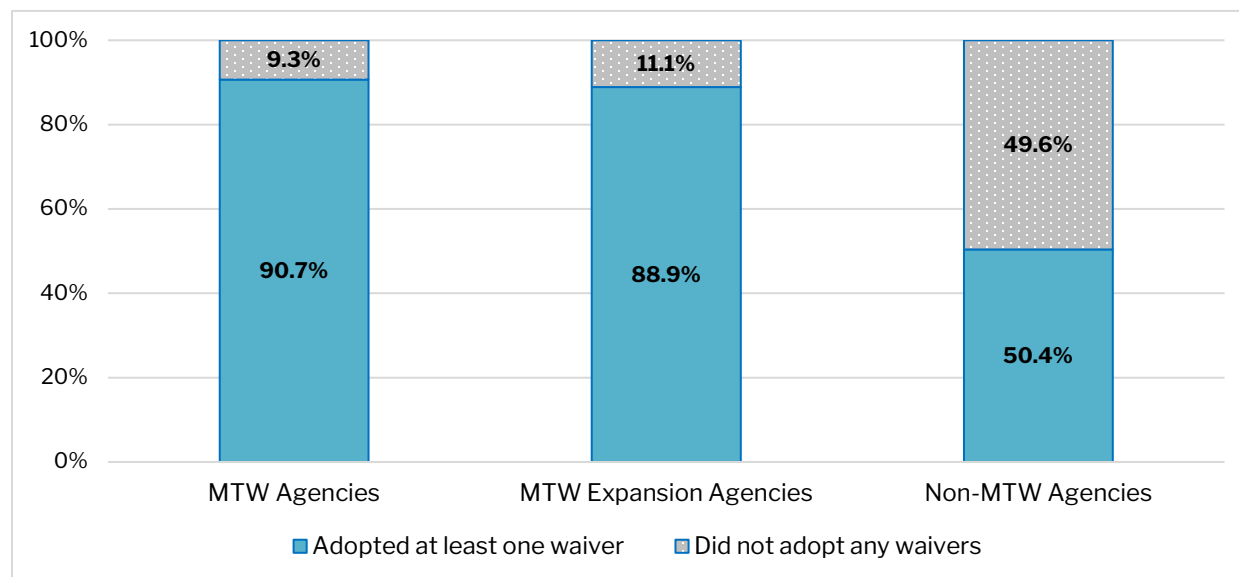
CARES Act = Coronavirus Aid, Relief, and Economic Security. HCV = Housing Choice Voucher.

Note: Differences between PHAs that adopted waivers and PHAs that did not adopt waivers, based on program type, were statistically significant based on a chi-square test.

Source: CARES Act Waiver Reporting Tool (CAWRT) Data

MTW Status: Exhibit 4.9 compares waiver adoption rates by MTW status. Data indicate a high waiver adoption rate among the initial MTW PHAs, with 90.7 percent of MTW PHAs adopting waivers. MTW expansion PHAs also show a high waiver adoption rate at 88.9 percent. In contrast, PHAs not participating in the MTW program demonstrate the lowest adoption rate, with only 50.4 percent adopting waivers.

Exhibit 4.9 | PHAs' Adoption of CARES Act Waivers by Moving to Work Status



CARES Act = Coronavirus Aid, Relief, and Economic Security. MTW = Moving to Work. PHA = public housing agency.
 Note: Differences between PHAs that adopted waivers and PHAs that did not adopt waivers, based on MTW status, were statistically significant based on a chi-square test.
 Source: CARES Act Waiver Reporting Tool (CAWRT) Data

Exhibit 4.10 presents the likelihood of PHAs adopting waivers based on their characteristics. It shows that location in the Far West and Beyond region, operating HCV programs only, participating in the MTW expansion program, or being a large-sized agency increased the likelihood of a PHA adopting waivers. These findings are consistent with observations from **exhibits 4.6–4.9**. The exhibit also identifies characteristics that decreased the likelihood of taking up waivers. Location in the Southwest region or operating a public housing-only program decreases the likelihood of a PHA adopting waivers.

Exhibit 4.10 | PHA Characteristics that Influence the Adoption of CARES Act Waivers

Category	Sub-category	Likelihood of PHAs taking up Waivers (%)
Region	Far West & Beyond	71.9
	Upper Midwest	59.6
	Northeast	59.0

Category	Sub-category	Likelihood of PHAs taking up Waivers (%)
	Southeast	55.2
	Midwest	44.0
	Southwest	35.1
Program Type	HCV Only	70.0
	Combined	61.3
	Public Housing Only	33.4
MTW Status	Y - Expansion	86.4
	Y	60.7
	N	51.8
Size	Large	84.5
	Medium	69.5
	Small	43.1

CARES Act = Coronavirus Aid, Relief, and Economic Security. MTW =Moving to Work. PHA = public housing agency.
Source: CARES Act Waiver Reporting Tool (CAWRT) Data

4.2.4 Reasons for Not Adopting Waivers

The researchers interviewed leadership from six PHAs that declined to adopt CARES Act waivers. Leadership from all six PHAs were aware of the waivers but felt they did not need to use them. They provided the following reasons for not adopting waivers—

- **Timing of Guidance.** Three PHAs indicated that the timing of guidance contributed to their decision not to adopt waivers. The first waiver notice came out April 10, 2020, only 2 weeks after the CARES Act was passed and 4 weeks after the President declared COVID-19 a national emergency, which led states to implement shutdowns. From HUD’s perspective, the guidance was provided quickly, within 2 weeks of granting authority. However, from the PHAs’ perspectives, a month had passed before they received any guidance after the COVID-19 emergency declaration. PHAs reported needing to adapt immediately, often devising their solutions before any official guidance was available. During the period between shutdowns and the issuance of the first waiver notice, these PHAs stated that they had “already addressed the issue for the waiver. Meaning, “[We] didn’t need a waiver because [we] already had a workaround.” Due to the circumstances of the pandemic, leadership from these PHAs needed to act more quickly to address issues than the time it took for Congress to pass the CARES Act and for HUD to release guidance.
- **Receiving Additional Funding.** Three PHAs received additional CARES Act funding or other local government grants that allowed them to continue their operations without interruption. For example, one PHA implemented broadband for their residents with the funding, ensuring their ability to reach residents virtually. One

leader indicated that had they not received extra funding, they would have considered adopting waivers.

- **Concerns About the Impact on Essential Services.** Three PHAs expressed concerns that implementing the waivers could negatively impact the quality of essential services, such as inspections and maintenance of units. These PHAs, therefore, declined to adopt the waivers.
- **Perceived Burden of Waivers.** Two PHAs were concerned that when waivers expired, HUD would require all deferred compliance requirements—such as inspections, reporting, and other administrative tasks that had been postponed due to the waivers—to be completed at once, creating a burden for staff or making it difficult to maintain compliance once the waivers expired.
- One PHA leader noted, “Waivers are generally hard because once the timeframe is up, then they want everything. I, generally, unless it’s an absolute emergency, try not to do waivers.” Paperwork burden was another concern of one PHA, based on their experience with waivers prior to the CARES Act: “The paperwork was so astronomical that I’m still dealing with it today. I’m still trying to get rid of the portion that we did not use, and they took back. It’s just been a nightmare with the paperwork.” A subject matter expert from the National Association of Housing and Redevelopment Officials (NAHRO)⁷⁴ provided additional context, noting that in their discussions with PHAs outside of this study, language in PIH Notice 2020-05—stating that “*HUD may subsequently require the PHA to provide information to HUD on the waivers used by the PHA and the date the PHA applied the waiver to its program(s)*”—suggested future reporting requirements, causing concern among some PHAs. Although these concerns were significant and impacted decisions by PHAs on whether to implement the waivers, the actual reporting requirements were not as substantial as anticipated by these PHAs.
- **PHA Size.** Two PHAs felt they were too small for the waivers to be useful. One leader stated, “[As a] small crew, you don’t have the time. I don’t know if I’m going to be sitting here at my desk or if I’m going to be out helping maintenance with a clogged drain... That’s one reason I don’t jump through the extra hoops and take advantage of those things.” The other PHA felt that because they had a small number of vouchers, maintaining their standard operations was manageable.

4.3 Objective 3: Document Outcomes Resulting from Implementing CARES Act Waivers

KEY TAKEAWAYS

- PHAs thought the most useful waivers were the Income Verification and Recertification waivers, Housing Quality Standards waivers, the Oral Briefing waiver,

⁷⁴ NAHRO is a membership organization of more than 26,000 housing and community development providers and professionals throughout the United States whose mission is to “advance the creation of strong, sustainable, and affordable communities through advocacy, professional development, and empowerment of our diverse members.” NAHRO provided subject matter expertise for this study and a review of this report.

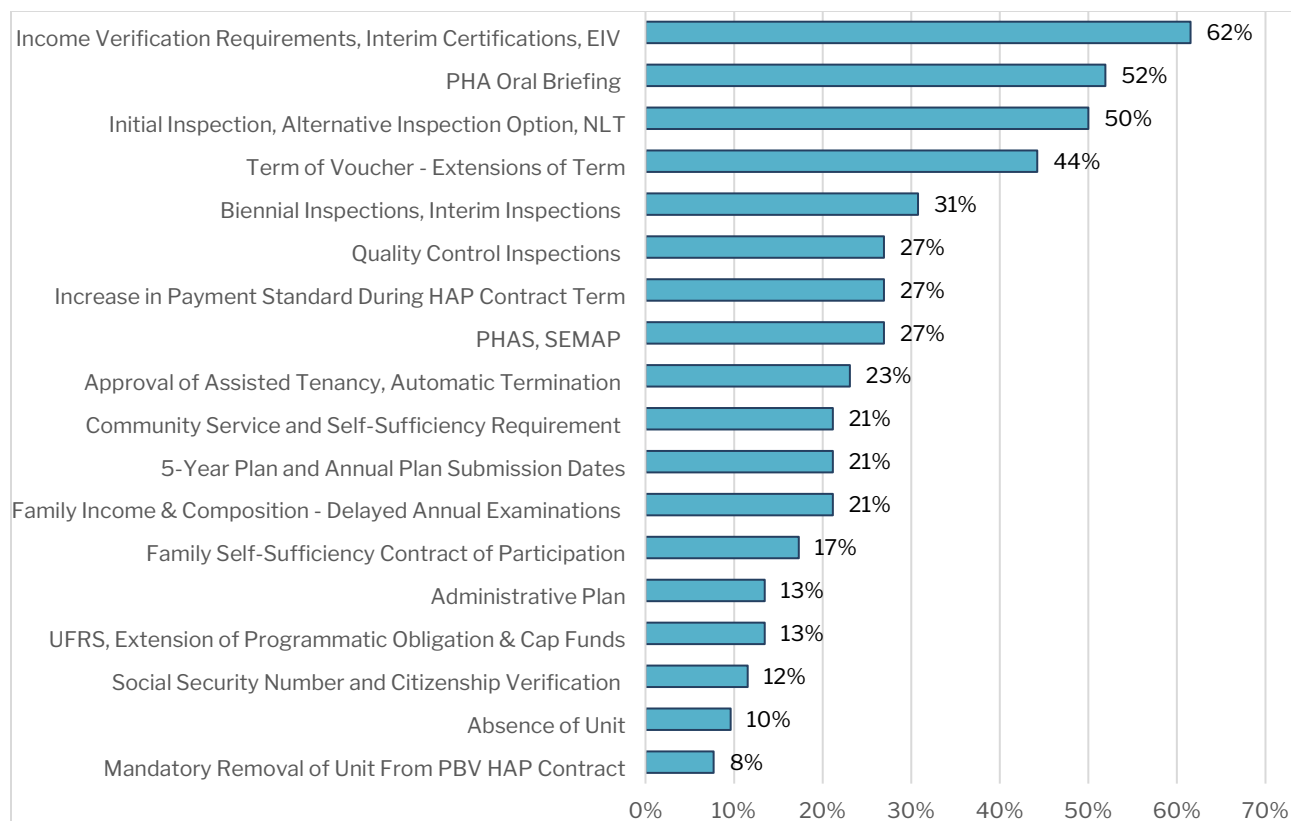
the Increased Voucher Time Extension waiver, the Increase Payment Standard During HAP Contract Term waiver, and the Administrative Reporting waivers.

- Benefits to PHAs included the flexibility to maintain services while complying with pandemic directives. Technology for oral briefings and remote inspections reduced administrative requirements, simplified processes, and freed up more time for staff to focus on other tasks.
- Benefits to households included reduced wait times for housing for new applicants and increased housing stability when households could not provide typically required documentation due to the pandemic.
- When waivers expired, PHAs faced backlogs that strained their ability to stay in compliance with HUD regulations.
- Some residents struggled with accessing technology to adequately benefit from waivers.

4.3.1 Waivers PHAs Found Most Useful

The researchers gathered information from PHA leadership and operations staff regarding the most impactful waivers (see **exhibit 4.11** for the types of waivers the interviewed PHAs adopted). This section delves into the waivers that PHAs found most beneficial post-implementation, recognizing that these perceptions may differ from the initial expectations regarding the waivers' usefulness. For PHAs that adopted more than 10 waivers, the researchers requested that they share information about their top five most useful waivers for their operations and assisted households. The subsequent sections outline the specific waivers that PHAs found most useful within each of the following categories—

- Streamlining Verification and Documentation Requirements.
- Flexible Inspection Practices.
- Adaptations in Housing Choice Voucher Operations.
- Relief in Reporting and Administrative Tasks.

Exhibit 4.11 | Waiver Adoption Rates Among Interviewed PHAs

HAP = Housing Assistance Plan. NLT = non-life-threatening deficiencies. PBV = Project-Based Voucher. PHAs = public housing agencies. PHAS = Public Housing Assessment System. SEMAP = Section Eight Management Assessment Program. UFRS = uniform financial reporting standards.

Source: The researchers' interviews with PHAs, October 2023-March 2024

Streamlining Verification and Documentation Requirements.

Thirty-four PHAs reported using waivers to modify income verification requirements and recertification processes. PHAs often needed to streamline these processes to reduce their administrative burden and adapt to constraints that hindered pre-pandemic verification methods. The 34 PHAs reported the following waivers as the most useful: Family Income and Composition: Annual Examination; Income Verification Requirements; Family Income and Composition: Interim Examinations; Enterprise Income Verification Monitoring; and Eligibility Determination: Income Verification. Many of these verification requirements impacted the re-examination of income and family composition, resulting in 11 PHAs utilizing the Delayed Annual Reexamination waiver. Six PHAs also reported the usefulness of waiving the requirements to verify social security number and citizenship determination.

These waivers were essential for PHAs, especially because many businesses were closed, and employers and government agencies were overwhelmed and unable to process income-verification paperwork. By using these waivers, PHAs could waive the HUD guidelines that typically mandate a hierarchical income-verification process for PHAs,

prioritizing up-front income verification, followed by third-party verification, and lastly, tenant declaration when other methods were unavailable.

Flexible Inspection Practices.

Flexibilities for inspections were crucial to ensure housing quality standards (HQS) could be maintained throughout the pandemic. The frequent use of waivers for initial inspections and self-certifications highlights this need, with 44 PHAs reporting the usefulness of waiving inspection requirements. One-half of these PHAs reported that the most useful measures for their operations included waiving initial inspections, allowing unit owner self-certification, and extending non-life-threatening repair deadlines. Waiving biennial and interim inspections emerged as notably beneficial, as highlighted by 16 PHAs, whereas 14 PHAs emphasized the utility of waiving HQS quality control inspections, and 7 PHAs acknowledged the advantages of remote video inspection. As stated before, although remote video inspections were technically flexibilities and not actual waivers, many PHAs still referred to them as “useful waivers.” Remote inspections provided a safe alternative that minimized exposure for tenants and inspectors, offered greater scheduling flexibility for landlords and tenants, and aided compliance with HUD’s inspection deadlines, ensuring the timely completion of essential assessments.

Adaptations in HCV Program Operations.

Flexibility within the HCV program is a recurrent theme that 35 PHAs discussed. The following paragraphs outline the benefits of HCV waivers:

- **Alternative Briefing Methods.** Although regulation (24 CFR 982.301(a)) mandated an oral briefing, it did not specify that briefings had to be conducted in person. The need to social distance during the pandemic prompted PHAs to seek alternative methods for conducting briefings. Twenty-seven PHAs acknowledged the utility of this waiver, employing virtual briefings, video recordings, and email communications as viable substitutions for in-person briefings. This option streamlined the process, reduced the need for individual in-person briefings, and saved staff time. It also accommodated individuals who could not attend in-person briefings due to health concerns or scheduling conflicts, allowing them to comply with the program requirements remotely and expedite the voucher issuance process.
- **Extension of Voucher Time.** HUD policy requires the initial term of an HCV to have a minimum search period of 60 days. PHAs can extend this timeframe to allow households a longer period to search for housing, and PHAs are required to include this length of time in their administrative plan. This waiver allowed PHAs to extend the time frame for voucher issuance without the need to amend their administrative plan, which 23 PHAs found useful. This extension gave families more time to search for suitable housing, especially during periods of limited housing inventory and given the challenges of conducting virtual viewings. Without this waiver, families may have lost their vouchers before finding a housing unit, leading to increased housing instability. The waiver also provided flexibility for individuals unable to search for housing due to social distancing measures during the pandemic.
- **Increase Payment Standard During Housing Assistance Payment (HAP) Contract Term.** Fourteen PHAs found it useful to apply the increased payment standard at any

time after the effective date of the increase in the payment standard amount. This waiver helps PHAs reduce negative impacts on tenants and prevent housing instability due to an increase in family rent burden. It is important to note that, in some instances, PHAs referred to “payment standard” waivers more generally. Some of these PHAs appeared to reference the expedited waiver labeled the Voucher Tenancy: New Payment Standard Amount when discussing CARES Act waivers they found beneficial. The researchers have chosen to report the usefulness of the waiver as presented by PHAs in the interviews. However, the PHA count may include some PHAs who were actually referring to the expedited waiver.

- **Flexibility in Processing HAP Contracts.** Twelve PHAs recognized the value of waivers that extended the processing time for HAP contracts, especially with the waiver allowing more time beyond the standard 60 days. This flexibility enabled PHAs to accommodate delays in receiving documentation from landlords, ensuring that families could continue to reside in their housing units without disruption. By extending the timeframe for HAP contract execution, PHAs could maintain stability for families and landlords, fostering greater participation from landlords and enhancing housing options for tenants.
- **Absence from Unit.** Five PHAs mentioned that this waiver was useful because it provided flexibility for tenants who needed to be away from their units for extended periods due to illness, caregiving responsibilities, or other extenuating circumstances. This waiver allows PHAs to accommodate tenants’ needs without automatically terminating their HAP contracts, enabling families to maintain their housing. By granting waivers for absences exceeding the standard time limits, PHAs supported vulnerable individuals and families, preventing disruptions to their housing.

Overall, this set of HCV waivers enhanced operational effectiveness, expedited housing assistance delivery, and supported residents during the pandemic and throughout housing market fluctuations.

Relief in Reporting and Administrative Tasks.

- **Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) Score Waivers.** These waivers proved useful to 14 of the interviewed PHAs during the pandemic, as they provided flexibility amidst increased workloads and operational challenges. These waivers allowed PHAs to prioritize immediate issues and support households. By preventing penalties for circumstances beyond their control, the waivers protected PHAs’ ability to remain in compliance and with future funding.
- **Extension of Financial Reporting Standards and Capital Funds Expenditure.** Seven PHAs found the finance-related waivers valuable, citing difficulties in meeting capital fund closeout dates due to contract work delays caused by the pandemic. These delays hindered planned projects and risked returning funds to HUD. Extensions on capital fund closeout deadlines provided flexibility, enabling PHAs to retain funds for essential projects and address delays in contractor availability. These waivers allowed for delays in financial reporting for PHAs transitioning to new software

systems or facing workforce challenges due to older employees self-isolating and adapting to remote work.

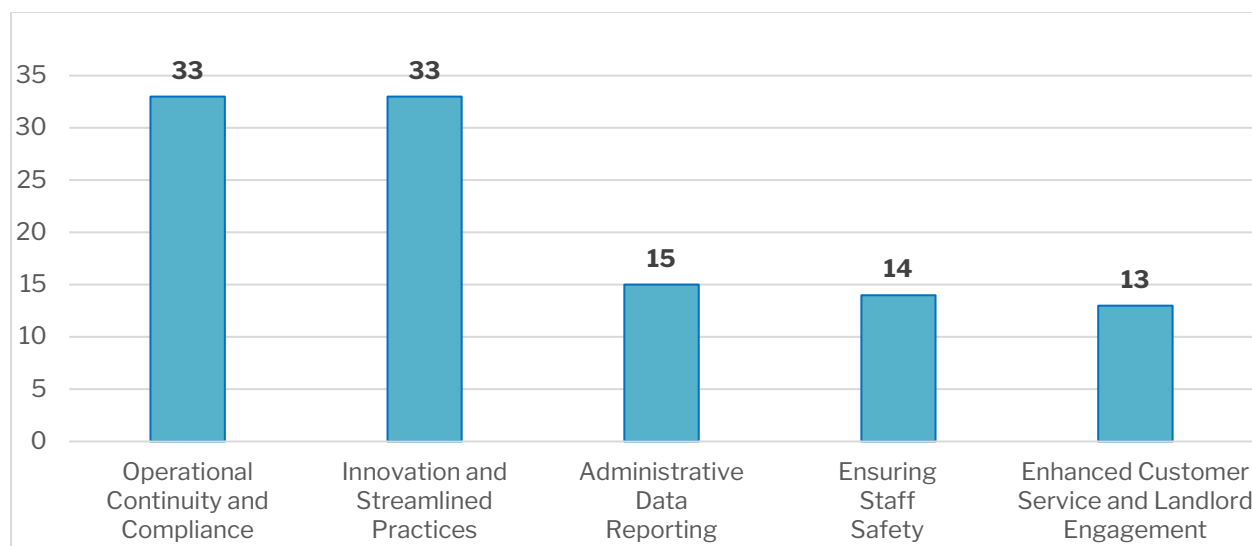
- **Five-Year, Annual, and Administrative Plan Flexibilities.** The flexibility granted around submission dates for the 5-year and annual plans benefitted 11 PHAs. The administrative plan waiver was also found to be useful by seven PHAs. By eliminating the need for board approval, this waiver expedited processes. These flexibilities allowed staff to work remotely, gather necessary supporting documents, and ensure deadlines were met despite logistical challenges.
- **Community Service and Self-Sufficiency Requirement.** Eleven PHAs found the Community Service and Self-Sufficiency Requirement waiver beneficial during the pandemic. Suspending this requirement relieved residents of the burden of fulfilling community service obligations that were not possible due to social distancing measures and closures of community service venues. PHAs recognized the challenges residents faced in meeting this requirement and appreciated the waiver's role in ensuring residents' safety and preventing eviction due to non-compliance.
- **Family Self-Sufficiency (FSS) Contract of Participation-Contract Extension.** Many PHAs offer the FSS program to help public housing residents and Housing Choice Voucher recipients achieve economic independence. Nine PHAs found the FSS waiver to be beneficial. This waiver allowed for extensions on FSS contracts, enabling clients to extend their terms of participation in the program. The extensions provided support for families facing difficulties in completing their original objectives within the program's timelines.

4.3.2 Outcomes of Waivers on PHA Operations and Services

Through interviews with PHAs, the researchers gained insights into the outcomes of CARES Act waivers on service delivery models and general PHA operations. Five overarching themes emerged as a result of PHAs adopting waivers:

1. Operational Continuity and Compliance.
2. Innovation and Streamlined Practices.
3. Administrative Data Reporting.
4. Ensuring Staff Safety.
5. Enhanced Customer Service and Landlord Engagement.

Exhibit 4.12 shows the number of PHAs that discussed each of the five themes.

Exhibit 4.12 | Number of PHAs that Discussed Outcomes of Waivers

PHAs = public housing agencies.

Source: The researchers' interviews with PHAs, October 2023–March 2024

Operational Continuity and Compliance. Thirty-three PHAs indicated that the waivers provided PHAs with the flexibility needed to maintain continuity of services, remain compliant with regulations during this challenging period, and maintain leased-up rates. Out of these 33 PHAs, 31 specifically highlighted the importance of waivers in enabling continued operations and compliance during the COVID-19 pandemic. One small PHA emphasized the importance of these waivers in allowing them to regroup and implement remote working tools, thereby making services more convenient for tenants. Leadership from this PHA explained, “It gave us some time to regroup as a small housing authority because we don’t have the staff that larger housing authorities have. We had to implement working remotely and get the tools necessary to make things convenient for our tenants, including adopting waivers for recertification.”

Larger PHAs noted the benefit of remote video inspections, which, although not a CARES Act waiver, allowed them to maintain compliance with inspection requirements. An operation staff member from one PHA explained, “With regards to Section 8, it allowed us to continue to be in compliance,” regardless of COVID. Because we implemented the remote video inspections, it didn’t matter if it was an annual inspection, an initial inspection, or a QC [quality control] inspection—we were able to conduct them.” These waivers facilitated uninterrupted annual certifications and income verifications, allowing PHAs to honor client self-certifications and process changes efficiently, which was beneficial for families experiencing decreases in income.

According to 15 PHAs, the waivers were crucial in maintaining the percentage of tenants who successfully leased up with a voucher during a period marked by a housing inventory shortage and rising rents, which made the housing vouchers difficult to use and decreased their success rates. Without these waivers providing tenants additional time to secure housing, many would have been unable to lease up within the standard time frame. An operations staff member from one PHA noted, “It was taking, on average, most people

more than the 120 days to find housing. If we didn't have that waiver in place, we would just be cycling people through to do paperwork and then expiring their vouchers, and nobody would've been housed. Our success rate for those that were housed was only possible because we were able to give people much longer to find housing."

PHAs experienced increased turnover and more frequent voucher expirations. Timely mail responses and flexible requirements were instrumental in sustaining leasing percentages and preventing program attrition. One PHA staff member stated, "It allowed us, again, to have continuity of services, be able to still feel comfortable with serving our residents, as well as being able to remain in compliance during that time frame. It was a beneficial solution to the COVID period."

Innovation and Streamlined Practices. Thirty-three PHAs reported adopting innovative practices and more efficient workflows that benefited the PHAs and their clients. Within this group, 27 PHAs specifically mentioned that the waivers encouraged them to adopt new and more efficient practices, such as remote video inspections, remote briefings, and other technological advancements. One PHA staff member noted, "It was chaotic, but like I said, the good thing out of COVID, we were able to make some changes and work smarter, not harder, be more technologically savvy, continue things like remote video inspections...that's a huge plus. Remote briefings, if possible, things like that. I think it's really helped." This transition was initially challenging for staff but ultimately led to more efficient and convenient operations.

Waivers were reported to have lowered administrative burdens for 18 PHAs, allowing them to concentrate on service delivery. A leader from one PHA highlighted, "I think the general recognition of any waiver provided that acknowledged the massive, unprecedented workload on our staff by allowing flexibility with deadlines or turning things in...that flexibility allowed us on the administrative side to focus on...the people we serve." This flexibility benefited maintenance teams and field staff, ensuring essential work continued without interruption. The waivers also facilitated streamlined processes for initial inspections and tenant leasing, helping PHAs stay compliant with workload and regulatory requirements. Reducing administrative tasks improved efficiency and service delivery for staff and tenants.

Administrative Data Reporting. Only 15 PHAs provided input on how CARES Act waivers changed how they reported administrative data. Out of those 15 PHAs, 8 found that waiver adoption did not impact reporting requirements. These PHAs were able to maintain their existing reporting processes without major changes or disruptions. The remaining seven PHAs found that waivers provided them with additional time and flexibility to meet reporting requirements. This benefit was most often mentioned in relation to SEMAP.

Ensuring Staff Safety. Fourteen PHAs highlighted that waivers were crucial in ensuring staff safety during the pandemic, especially for field teams. The waivers allowed staff to continue their essential work while reducing risks. An operation staff member from one PHA noted, "It gave us comfort knowing we were staying safe, protecting [tenant] families, and our own [families] while at work."

Many PHAs benefited from delayed biennial inspections, which reduced the need for staff to enter homes. An operation staff member from one PHA shared, “The delay helped ease safety concerns by limiting the need to enter people’s homes, making staff feel safer.” The flexibility in inspection timing, particularly for emergencies or new move-ins, was noted by PHAs as having a positive outcome on staff and tenants’ safety. A leader from one PHA explained, “We could approve move-ins without going out in the field, reducing risks for everyone.”

Enhanced Customer Service and Landlord Engagement. Thirteen PHAs reported that waivers improved tenant engagement, flexibility, and accessibility. Within this group, eight PHAs specifically mentioned that waivers improved tenant engagement by allowing them to adopt more tech-savvy practices, such as accepting photos of bank statements and employment verifications via email, reducing the need for in-person visits. An operations staff member from one PHA stated, “People became more tech-savvy in regard to accessibility. We allowed photos of bank statements and employment verifications, things like that. We tried to be as flexible as possible.” Other PHA staff noted that these changes made the process convenient for tenants, who could submit documents without leaving their homes. With more people staying at home, tenant participation in briefings increased because they could attend remotely, eliminating transportation barriers. The simpler intake process and quick handling of interim reexaminations improved service delivery, allowing PHAs to meet community needs with greater flexibility and responsiveness.

In addition, 11 PHAs also reported that waivers strengthened their relationships with landlords, leading to improved cooperation and housing stability. Several waivers streamlined processes like inspections and HAP contracts, making it easier for landlords to participate in the program. Leadership from one PHA emphasized, “We were talking about making the program more accessible for residents, but anything that makes it easier for landlords is also key. The stuff with the inspections and the HAP contracts, that made it easier for the landlords to be able to access the program. I think that’s really important, especially in markets like [ours] where it’s really competitive and where people have the option to turn down a Section 8 voucher.” PHAs emphasized the importance of understanding landlords’ needs and providing them with financial security to foster a successful partnership. The introduction of self-certification further reinforced trust, enhancing the relationship between PHAs and landlords. Overall, this collaborative effort contributed to the success of leasing programs and community stability.

4.3.3 Outcomes of Waivers on Assisted Households

Two themes emerged when the researchers asked PHAs about the impact of waivers on their assisted households. First, PHAs felt the waivers played an important role in ensuring housing stability and safety for current residents. Second, PHAs believed that the waivers led to enhanced access and efficiency for applicants. These waivers kept residents safe, reduced their burdens related to income verifications and recertifications, and made it easier for voucher holders to find homes, helping them compete more effectively in the rental market. A few PHAs also discussed the negative outcomes of the waivers on assisted

households. The following themes detail a comprehensive understanding of their implications and benefits.

Housing Stability and Safety for Current Residents. Only six PHAs reported that the waivers had a positive impact on residents by streamlining income verification and other recertification processes. These waivers allowed residents to complete income verification and recertification processes without access to traditional income forms, which was particularly beneficial when many people were unemployed. The waivers also simplified the income verification process by accepting self-certification from clients, which expedited the processing of income changes and decreases. An operations staff member from one PHA staff member explained the significance of these waivers, stating, “I would say maybe the family income and composition income verification requirements. That was a big one because that way we were able to get these verifications not via the hierarchy. Clients were able to declare information, and we were able to use that.”

For these same reasons, five PHAs noted that the waivers helped prevent evictions. Typically, tenants who fail to meet administrative deadlines are terminated from the program. However, these waivers provided security to residents who, because of the pandemic, may have otherwise struggled to meet deadlines. As leadership from one PHA noted, “I would say that it had to have been a positive effect. We weren’t having to terminate somebody’s assistance just because we couldn’t get all the documentation we felt that normally is needed to complete a recertification.”

According to seven PHAs, the waivers kept residents safe and reduced their burdens related to income verification and reexamining documentation. Allowing annual recertifications to be completed through alternative methods eliminates the need for in-person interactions—especially for households with older adults and individuals with disabilities—and the waivers helped minimize the risk of exposure to COVID-19. PHAs were able to provide alternative options such as safe drop boxes and electronic submissions. These options eased the burden on residents in accessing and submitting necessary documentation, contributing to their overall sense of safety and security. An operations staff member from one PHA emphasized how the CARES Act waivers were particularly useful in protecting vulnerable populations during the pandemic, “I think that the CARES Act waivers really came in handy during COVID as far as having people be able to do their annual recertifications via mail due to illnesses and things like that. Not having to bring people in and put people at risk was a real plus for us because we do work with a lot of elderly people and disabled people, and putting them at risk for COVID was just something that we really didn’t want to do. It was nice to be able to have these waivers to prevent any more sickness from spreading.”

Enhanced Access and Efficiency for Applicants. Only five PHAs highlighted that the waivers streamlined the process for applicants to meet program requirements and move into housing. Likewise, four PHAs noted that the waivers reduced the wait time for new applicants to receive housing assistance by allowing self-certification for initial housing inspection and facilitating remote inspections, benefiting tenants and inspectors. These waivers streamlined the process and minimized delays, ultimately expediting the housing assistance process for new applicants. An operations staff member from one PHA noted, “I

feel like it allowed us to get some new units, meaning tenants move in and not wait 7 to 10 days on an inspection because we allowed them to move in without an inspection.”

Finally, six PHAs acknowledged that the waivers extended the allowable time for voucher utilization and lease up, addressing challenges in housing inventory and rental market competitiveness. This waiver benefited voucher holders by providing additional time to secure suitable housing in fluctuating rental markets.

Outcomes of Waivers on Voucher Utilization and Budget Utilization

The researchers explored the change in outcomes between PHAs administering HCV programs by comparing those that adopted waivers with those that did not, using data from the Housing Choice Voucher data dashboard. The findings show a .51 percentage point increase in voucher utilization rates and a .26 percentage point increase in budget utilization for PHAs that adopted waivers. These results are not statistically significant but do align with PHA claims that waivers helped them to maintain leasing percentages. Refer to **appendix E** for more details from the exploratory analysis of administrative data.

Negative Impacts of Waiver Adoption. Twelve PHAs thought waiver adoption caused negative impacts on tenants. Leadership and operations staff from 11 PHAs believed that residents who were unable to use technology were negatively impacted by waiver adoption because they were unable to complete the necessary tasks. Only two PHAs were concerned that self-certification of inspections may have led to poor housing conditions. PHAs varied in their use of virtual inspections to verify self-certifications. Those who did implement virtual inspections found that the quality depended on knowledge of a home’s features, such as the location of the boiler, and technological abilities, like the ability to operate Facetime. Operations staff from one PHA explained, “Some participants did...virtual inspections, [but the] population that we work with [is] low to no income...having a phone with a camera on it is a luxury. It’s not a must.” Both concerns were raised as challenges PHAs faced when implementing waivers (see Section 4.1.5 for examples of each challenge).

Building on the positive impacts of the waivers, particularly in housing stability and access for applicants, the researchers examine the broader effects of expedited waivers on PHA operations and assisted households in the next section.

4.3.4 Outcomes of Expedited Waivers on PHA Operations and Assisted Households

The expedited waivers provided benefits to PHAs and assisted households. PHAs experienced a lowered administrative burden, making processes easier and allowing them to catch up on tasks. This result was especially true for PHAs that requested SEMAP waivers and had HUD carry over their most recent scores. For assisted households, the waivers enabled broader voucher usage and extended voucher terms, providing immediate relief for housing shortages and allowing families to successfully lease up. The higher payment standard also helped offset substantial rent increases, allowing for competitiveness in the rental market. **Exhibit 4.13** provides a breakdown of expedited waivers requested by PHAs. It is important to note that interviewed PHA stakeholders discussed the usage of these expedited waivers from their individual perspectives, and

many respondents were either uncertain about the details or not present when the waivers were implemented.

Exhibit 4.13 | Number of PHAs from the Sample that Adopted Expedited Waivers

Type of Expedited Waivers	Number of Interviewed PHAs Discussing Waiver Usage
Voucher Tenancy: New Payment Standard Amount	10
Inspection Flexibilities	4
Self-Certification and Income Verification Flexibilities	1
SEMAP - Section 8 MAP	7
Term of Voucher - Extension of Term	4

PHAs = public housing agencies.

Source: The researchers' interviews with PHAs, October 2023–March 2024

4.3.5 Impacts of Waiver Expiration on PHA Operations

Twenty-three PHAs discussed the transition period post-waiver expiration. Nearly all found that discontinuing waivers negatively impacted their operations. The researchers present the challenges PHAs identified during the interviews.

Inspection Backlog and Catching Up with Administrative Tasks. The most common challenge for 20 PHAs was a backlog of inspections. When the waivers expired, many PHAs struggled to catch up. An operations staff member from one PHA explained, “When they did lift the HQS inspection...we were behind [by] close to 400 inspections. I had one inspector...to do all the annuals, all the new ones, and repeat all these other 400 inspections. It was impossible. Financially, we were hit hard because I had to hire an independent entity to catch us up.” Even after catching up, two PHAs found that their SEMAP scores declined after waiver use. Leadership from one PHA said, “We used the owner certification, and we did a Zoom at the same time... We combined [the initial inspection and NTL inspection], and I got dinged on my SEMAP for utilizing this waiver. I’m very frustrated with that because I used this waiver [for] the initial inspection [and] non-life-threatening deficiencies, but I got dinged for it.” The PHA did not offer more information about the circumstances of their reduced SEMAP score.

As discussed in 4.1.3, some PHAs feared HUD’s handling of waiver expirations even in the implementation phase, and some PHAs reported not fully utilizing their adopted waivers because of it. Ultimately, 23 PHAs reported struggling to maintain compliance post-waiver expiration.

Residents’ Challenges in Returning to Normal Operations. Returning to pre-pandemic operations entailed difficulties beyond PHAs catching up on inspections. Leadership and operations staff from one PHA stated, “Getting the tenants back into the flow of the regular rules, especially those that may have entered the programs during [the waiver period] ...can

be somewhat difficult because if they came in during those waivers, that's all they knew." Seven other PHAs reported similar experiences.

Even on the PHA side, similar resistance sometimes occurred. Leadership from one PHA felt that HUD let the waivers expire too soon, stating, "When we were supposed to start going back and doing inspections of the units, COVID was ramping back up again. It was hard for us. We didn't want to go back and start doing inspections when [COVID] was huge. I don't think HUD took that into consideration of where we were. I think it hit some places faster than it hit others. That was frustrating and tough."

Rent Burden and Reduced Mobility. Three PHAs were concerned about the potential expiration of the Increase in Payment Standard During the HAP Contract Term waiver and the Voucher Tenancy: New Payment Standard Amount waiver and its impact on tenants. PHAs expressed fears that rising market rents could create a rent burden on tenants and reduce their mobility if the waivers were discontinued. For example, operations staff from one PHA feared, "If they wanted to move, it would affect them because they would have to go back to the decreased payment standard. I think it would affect their mobility... If I'm given the choice that my payment standard is going to go down by \$150 if I move, I'm not moving."

Operations staff from another PHA highlighted the challenges caused by not applying increased payment standards during re-examinations, leading to additional financial strain on tenants. The staff explained, "The one impact that we're experiencing now is not applying the increased payment standards at the time of the re-exam. It's putting them in a rent burden, especially when the owner requests a contract rent increase and it's approved, a lot of what's happening to the tenant is picking up the increase." The recently finalized Housing Opportunity Through Modernization Act of 2016 (HOTMA) Voucher rule addresses the rent burden fears by continuing some payment standard flexibilities, providing tenants with ongoing support in managing their housing costs. However, at the time of the interviews, PHAs were uncertain if these payment standard flexibilities would continue.

4.4 Objective 4: Explore Future Policy and Program Implications

This section offers insights on the potential impacts of continuing or discontinuing the CARES Act waivers on PHAs and assisted households. It also includes suggestions from PHA staff and leadership for improving future waivers and processes, and other flexibilities that would streamline PHAs' operations and better support assisted households in the future.

KEY TAKEAWAYS

- PHAs want HUD to continue waivers for the Income Verification Requirement, Community Service and Self-Sufficiency Requirement, Oral Briefing, Increase in Payment Standard During the HAP Contract Term, and Housing Quality Standards (HQS) Inspections.

- Many PHAs supported the continuation of HQS waivers, but some PHAs expressed concern about the lack of oversight negatively impacting residents’ housing quality.
- PHAs think HUD could improve waivers by simplifying the adoption process, improving communication, and offering tailored waivers for small and rural PHAs.
- PHAs recommended HUD add waivers to simplify income verification and interim certification, reduce annual income certifications for those on fixed incomes, increase Project-Based Voucher (PBV) caps, accept documentation and rent payments online, and revise criminal background screening requirements.

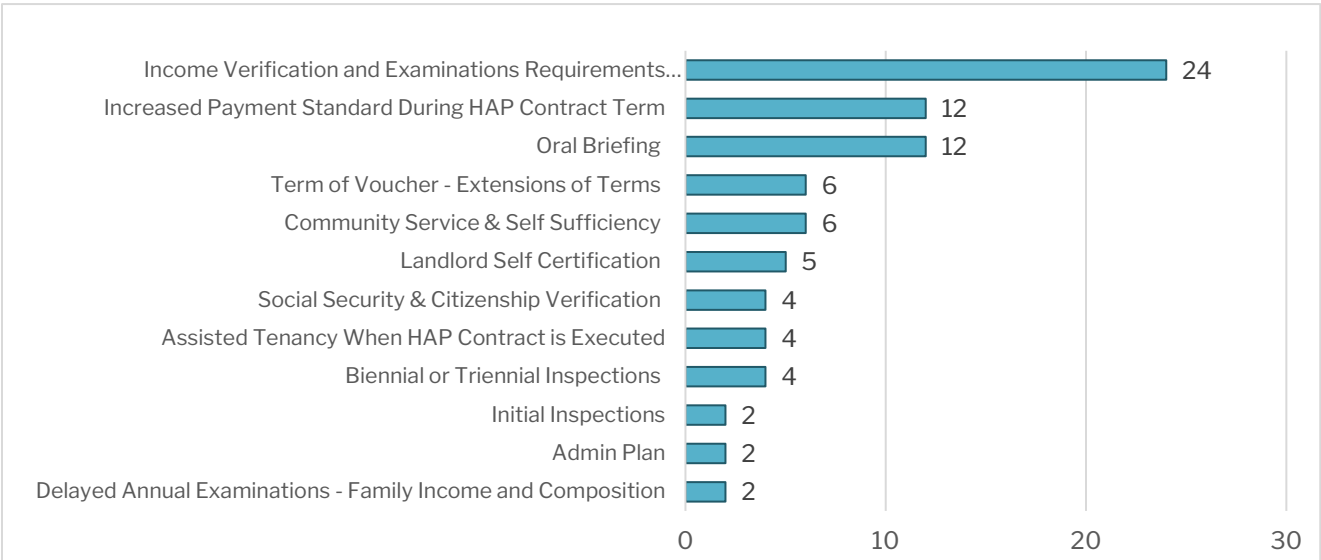
4.4.1 PHAs Preference for Waivers to be Continued

Among the PHAs that adopted the waivers, 46 identified various waivers they deemed beneficial to maintain (see **exhibit 4.14**). The waivers that PHAs hoped would become permanent overlap with the waivers they found useful, which were discussed in Section 4.3.1. It is important to note that some of the PHAs’ preferences and suggested modifications may require HUD to obtain express approval from Congress. The most cited waivers that PHAs wanted to become permanent are the following:

- Income Verification Requirements waiver.
- Community Service and Self-Sufficiency Requirement waiver.
- Oral Briefing waiver.
- Increase in Payment Standard During the HAP Contract Term waiver.
- Housing Quality Standard Inspections waiver.

The researchers also detail any modifications suggested by PHAs to enhance the effectiveness and relevance of the waivers, should they be continued.

Exhibit 4.14 | Waivers PHAs Want to Be Continued



HAP = Housing Assistance Plan. PHAs = public housing agencies.
Source: The researchers’ interviews with PHAs, October 2023–March 2024

Income Verification Requirements Waiver. Twenty-seven PHAs interviewed shared preferences to continue at least one waiver related to modifying income verification requirements and recertification processes. Only two PHAs wanted to continue the Delayed Annual Reexaminations, and four PHAs wanted to continue the Social Security and Citizenship Verification waivers. However, 24 PHAs, about 46 percent, shared that they hoped to continue the waiver on Income Verification Requirements. PHA leaders and staff highlighted the benefits of this waiver on their operations and residents. A leader from one PHA noted the flexibility the waiver offered in the verification process, “I really appreciated the flexibility with the verification hierarchy. That was probably the most impactful for my role specifically. I think that we both should become a little bit more flexible permanently on those things.” An operations staff member from another PHA noted the importance of adapting verification processes to local needs, stating, “I think the flexibility and verification was huge. Frankly, every place is different...I think if there’s a reliable means, because I understand the need to keep the program solid and responsible, but as long as I have reliable means of doing that, I don’t think it should necessarily be prescribed what those means are.” Finally, leadership from a third PHA underscored the broader impact of the waivers on staff administrative burdens, noting, “I strongly feel that anytime that they can make reporting requirements easier on our residents and program participants, it makes our lives easier here.”

PHA leaders and operational staff in favor of continuing the income verification requirements and recertification waivers also spoke of the ability to increase accessibility in the process for their assisted households, especially for households with older adults and individuals with disabilities. These household members are likely to have Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI) with fixed annual rate increases. As a result, the PHA leaders and operational staff noted that the Income Verification Requirement and Annual and Interim Reexaminations waivers would save staff time and resources by enabling them to complete the recertification process more quickly. Regarding modifications to the Delayed Annual Reexamination, two PHAs suggested a waiver that would allow them to waive the annual recertification in very special cases.

Community Service and Self-Sufficiency Requirement Waiver. Six PHAs believed that the waiver on community service and self-sufficiency should be made permanent. Leadership and operational staff from these PHAs explained that the community service requirement was largely ineffective in meeting HUD’s goals for community engagement, suggesting that alternative methods could better involve public housing residents in their local communities. As an operational staff member from one PHA shared, “I understand the intention, but I don’t think they’re getting the output that they expect. There’s probably a better way to achieve having someone contribute toward their assistance.”

Oral Briefing Waiver. Twelve PHAs advocated for the continuation of the Oral Briefing waiver. These PHAs mistakenly refer to virtual briefings as oral briefing waivers.⁷⁵ However, virtual briefings were already permitted under 24 CFR § 982.301(a)(1) and continue to be available to PHAs. Nevertheless, many PHAs felt that continuing this waiver beyond the CARES Act to permit remote briefings would be beneficial. According to the PHAs, this waiver increased efficiencies for their staff and enhanced accessibility for applicants by expediting the move-in process. In particular, the flexibility to conduct briefings remotely proved beneficial for individuals with mobility challenges. An operations staff member from one PHA stated, “I recently conducted a briefing over a Zoom call for someone who was not physically able to come to the office due to medical and disability-related issues. Rather than having to go through the reasonable accommodation route and obtain documentation from a doctor, we were able to offer a briefing on the computer, making the process seamless for that individual.” Leadership from another PHA highlighted the time savings from conducting electronic briefings, stating, “We do briefings electronically. That saved a tremendous amount of time. We used to do big group briefings that took a couple of hours of a staff person’s time. Now, we just contact our clients individually, and they get our video.”

Increase in Payment Standard During the HAP Contract Term Waiver. Twelve PHAs expressed interest in continuing this waiver to handle rent increases. This waiver helps PHAs reduce negative impacts on tenants and prevent housing instability due to an increase in family rent burdens. It is important to note that, in some instances, PHAs referred to “payment standard” waivers more generally. Some of these PHAs appeared to reference the expedited waiver titled Voucher Tenancy: New Payment Standard Amount when discussing waivers authorized under the CARES Act that they would like to see continue. The researchers have chosen to report support for the waiver as presented by the PHA in the interviews. However, the PHA count may include some PHAs who were actually referring to the expedited waiver. Despite this seeming confusion, PHAs generally appreciated any waiver allowing flexibility in payment standards that allowed them to react to the market. For instance, leadership from one PHA noted, “We would like to see the one where we can increase [the payment standard] up to 120 percent continue because I think that’s been super-beneficial, especially with the rents as high as they are now for our families, as well as the increase in the payment standard throughout the term of the contract.” Leadership from another PHA highlighted the need to exceed the current 120 percent cap on payment standards in certain situations without HUD approval. The leadership member explained, “It’d be nice if we had the ability, in some instances, to go above the 120 percent [cap] for payment standards... If you have a single person on SSI and they’re living in a unit that just had one of those \$150 rent increases, I’d like to have the ability, on a case-by-case basis, to be able to up that payment standard to prevent them from having to move.”

⁷⁵ An oral briefing is a required information session for voucher participants, typically conducted in person. A virtual briefing refers to any briefing conducted using virtual platforms (e.g., video calls). The Oral Briefing waiver under the CARES Act permitted PHAs to conduct required oral briefings using alternative methods such as video calls, webcasts, or even expanded informational packets, and virtual oral briefings have always been an option under HUD regulations.

Housing Quality Standards Inspection Waivers. Twenty-one PHAs believed that the Housing Quality Standards Inspection waivers would be useful to continue. PHA leadership and operational staff felt that allowing landlords to self-certify, conduct biennial or triennial inspections, and continue virtual inspections would still accomplish the core goal of high-quality housing. These waivers also make this process faster and require less staff time.

Regarding modifications to inspection waivers, three PHAs suggested that they be allowed flexible inspection scheduling and given more time and discretion when catching up on a backlog of inspections.

4.4.2 PHAs Preference for Waivers to be Discontinued

Most PHAs indicated that they would not express an opinion on discontinuing certain waivers, even if they found some unnecessary, as they believed other PHAs might find them beneficial. However, 18 PHAs did suggest discontinuing specific waivers, considering them less useful outside of a pandemic context. The most cited waivers these PHAs did not want to be continued include the Housing Quality Standards Inspections waiver, the Extension of Voucher Terms waiver, and the Delayed Annual Reexamination waiver. The primary reasons for not wanting to continue these waivers include concerns about maintaining program integrity, ensuring effective oversight, preventing potential abuse, and preventing inspection backlogs.

Housing Quality Standards Inspection Waivers. Although 21 PHAs saw value in continuing the Housing Quality Standards Inspection waivers, 9 PHAs expressed reservations. Although these waivers allowed for flexibility during the pandemic, these nine PHAs felt that not conducting regular in-person inspections could lead to significant issues and that the allowance should no longer be necessary. For instance, leaders and operational staff from four PHAs stated that conducting in-person inspections of units was important to ensuring that units were in good condition and regular maintenance was performed. The PHA leaders and operational staff also explained that the inspection waivers would create a backlog of inspections over time and negatively impact their SEMAP scores. The PHAs provided additional reasons why these waivers should not be used again. A leader from one PHA highlighted the potential risks of self-certification: “I think landlords self-certifying for apartments would help with efficiency, but it’s important that we get in those units. We deal with vulnerable populations, and ensuring the apartment is up to standard is crucial. Not inspecting for 3 years can result in significant issues, such as tenant hoarding situations getting out of hand.”

Extension of Voucher Terms. Four PHAs found the continuous use of the Extension of Voucher Terms waiver problematic. Although this waiver allowed PHAs to grant a family one or more extensions of the initial voucher terms without amending the PHA’s administrative plan to allow for these extensions, it led to an administrative burden. One PHA believed frequent adjustments due to extended voucher terms created extra work and risked potential mismanagement if used regularly. Some PHAs also felt that reverting to standard procedures would ensure fast contracting and reduce unnecessary extensions, ultimately streamlining the process and improving efficiency.

Delayed Annual Reexamination. Four PHAs expressed concerns about continuing this waiver, emphasizing its potential to disrupt program integrity and create administrative backlogs. Leadership from one PHA noted the importance of regular re-examinations: “Out of the waivers, I wouldn’t really want to see any of the ones I had⁷⁶ [become] permanent because I think it’s important that we do re-exams. A lot of things could fall through the cracks, and landlords might not make necessary repairs. So, I deem that necessary.” Leadership from another PHA explained the challenges that delayed annual reexaminations could pose to their workflow: “I would not delay the annual reexaminations. I think that still has to take place. If that were extended, you could delay annual recerts, but it would make it difficult to catch back up again.”

These PHAs also pointed out that delays in annual reexaminations could result in more significant issues over time, including difficulties in tracking and verifying tenant information and ensuring that units meet required standards.

4.4.3 Expedited Regulatory Waivers as a Continuation of CARES Act Waivers

As discussed in Section 4.3.4, HUD granted several PHAs expedited regulatory waivers after the expiration of the CARES Act waivers, highlighting their types and benefits. This section focuses on the views expressed by PHAs during the interviews regarding whether the expedited regulatory waivers are a good continuation of the CARES Act waivers.

Eleven PHAs support expedited regulatory waivers as a continuation of the CARES Act waivers. They appreciated the flexibility and efficiency these waivers provided, particularly in responding to immediate needs and maintaining operational continuity. A leader from one PHA noted, “When housing authorities are in a situation where we need immediate relief or response, those expedited waivers did assist us. I do believe keeping something expedited that is benefiting the housing authorities is always going to be a good thing.”

Some PHAs indicated a lack of awareness or understanding of the expedited regulatory waivers, which affected their ability to use these flexibilities effectively. For instance, a leader of a small PHA mentioned, “I would have to go back and look to see what the waivers even are because it’s been a while since I’ve looked at them. If it would help other housing authorities, then yes, I’m sure. I think it’s good to have it out there.”

Three PHAs did not adopt the expedited waivers but recognized their potential benefits. A leader from a large PHA stated, “We didn’t adopt any of them because we felt they were not particularly helpful, but if the process remained the same with more expanded waivers, then I don’t have any concerns about the process.”

The PHAs’ feedback indicates that although the concept of expedited regulatory waivers is broadly supported as a continuation of the CARES Act waivers, better communication and

⁷⁶ The waivers this PHA adopted included the Delayed Annual Reexaminations waiver, the Initial Inspection Requirements waiver, the HQS Quality Control waiver, the Inspections waiver, and the Extension of Deadline for Programmatic Obligation and Expenditure of Capital Funds waiver.

education about these waivers may be required to ensure PHAs can fully benefit from their use.

4.4.4 Suggestions to Improve Processes for Regulatory Waivers

Fifteen PHAs provided suggestions on how HUD could improve processes for implementing regulatory waivers. The researchers grouped the PHAs' feedback into three main themes: enhancing flexibility and guidance for PHAs, improving communication and transparency, and empowering local stakeholders.

Enhance Flexibility and Guidance for PHAs. Out of the 15 PHAs, 8 discussed the need for a simplified waiver process and better guidance from HUD. Among these PHAs, two specifically found the HUD's standard waiver process too complicated and time-consuming, which deterred them from applying for regulatory waivers. Notably, these two PHAs are among those that did not adopt any of the CARES Act waivers. They explained that simplifying the waiver process would make it more accessible, especially for smaller PHAs with limited resources. A leader from one PHA expressed this sentiment: "The whole waiver process is too complicated, and that's why no one does it. Simplifying the process would help us tremendously."

Five PHAs also suggested that HUD could offer more tailored flexibilities for non-troubled, small, and rural PHAs, considering their unique challenges and operational constraints. For example, a leader from a small PHA stated, "[Given] the difference between an urban large PHA and a small rural PHA... It would be great if they [HUD] allowed smaller PHAs flexibility in their programming and some of their regulatory requirements." The PHA leader added that this approach would help ensure that all PHAs, regardless of size or location, could effectively manage their programs.

Improve Communication and Transparency. Four PHAs recommended that HUD streamline communication processes, particularly by empowering local HUD field offices to make decisions and communicate more directly with PHAs. This streamlining would expedite the waiver implementation process and make it more efficient.

A leader from one PHA noted, "I would like there to be more information that comes out about the availability of [regulatory] waivers and [HUD] communicating really with the field office, and let them do the communication with the PHA... It moves a little quicker that way."

Two PHAs also suggested that HUD regularly publish information on common waiver requests and approvals to provide guidance and facilitate easier navigation of the waiver process. A leader from one PHA highlighted the benefits of this approach: "It would be helpful if HUD published quarterly, 'Here are the three most common waiver requests that we received and granted.' This [information] would help us understand what others are doing and adopt similar practices." Although HUD already publishes regulatory waivers approved in the Federal Register, it may be beneficial for HUD to consider additional ways to share this information to further inform PHAs.

Empower Local Stakeholders. Five PHAs emphasized the need for HUD to deepen its engagement with local stakeholders, including PHAs and community representatives, to better understand their needs and challenges. A leader from one PHA stated, “I would love to see HUD go on a bit of a listening tour. They’ve done similar things in the past, but I think it would be useful to work more closely with the state groups.” This approach would ensure that the waivers and flexibilities offered are relevant and effectively address the unique issues faced by different regions.

Two PHAs believed that HUD should “delegate the approval [of waiver requests] to local HUD offices to expedite the process.” By allowing local offices to make decisions, HUD could respond more quickly to the needs of PHAs and streamline the implementation of waivers.

4.4.5 Recommended Additional Waivers to Improve Flexibilities

In addition to identifying the waivers PHAs would like to see continued, modified, and improved, the interviews provided an opportunity for PHAs to recommend ways for HUD to enhance their flexibilities through additional waivers. PHAs identified several additional waivers not offered by the CARES Act but could enhance their operations and better support their communities.

Simplified Income Verification and Interim Certifications. Eight PHAs highlighted the need for more flexibility in income verification and interim certifications. Three of the eight PHAs suggested allowing more discretion in determining when to conduct these processes to reduce administrative burdens.

Leadership from two PHAs recommended removing the requirement for bank statement verification during income verification and instead allowing residents to attest to their financial information. Currently, PHAs can allow residents to self-certify assets up to \$5,000. This amount will increase to \$50,000 once the respective PHAs comply with Section 104 of HOTMA. The PHA leaders provided the following reasons for their recommendation—

- One leader stated, “Take the requirement away for having to provide a bank statement and going with what they write down and having them attest what they say is true, to just make things a little easier on tenants of having to provide documentation for their annuals.”
- Another leader said, “Our staff and our residents alike spend a lot of time gathering things for bank accounts that are worth \$14 and things of that nature, where now we are going to be allowed to take statements on it.”

Reduced Frequency of Annual Recertifications. Related to the previous points, three PHAs suggested reducing the frequency of annual recertifications, especially for households with fixed incomes, to decrease administrative workload. A leader from one PHA noted: “Recertifying incomes every 3 years instead of annually would help us focus on more critical issues and reduce the burden on residents.” The PHA leader explained that many residents, such as those on fixed incomes, do not experience significant changes in their financial

situation from year to year, making annual recertifications redundant. The researchers are aware that 24 CFR 960.257 and 24 CFR 982.516 allow for streamlined income determinations for households with fixed incomes. Although annual adjustments can be made using cost-of-living adjustments (COLAs), PHAs must conduct a full third-party verification of all income amounts every 3 years.

The researchers have listed other waivers and flexibilities that PHAs recommended. These recommendations were each provided by leaders from one PHA:

- Increase Project-Based Voucher (PBV) caps. A leader from one PHA stated, “Raising the cap for project-based vouchers would be helpful. It would allow us to provide more stable housing options.”
- Provide waivers for Veterans Affairs Supportive Housing (VASH) vouchers. A leader from one PHA commented: “VASH needs its own set of waivers. The program has unique challenges, and the current waivers don’t fully address them.” Although the VASH program already has its own set of waivers, as detailed in the Federal Register, it is possible that some PHAs might not be fully aware of these existing provisions or the extent to which they can be applied. The VASH program has had specific waivers designed to address its unique requirements and challenges for years.⁷⁷
- Provide waivers for criminal background checks to house more homeless participants. This PHA leader noted, “The other thing would be the...criminal background screening. There was a waiver that we don’t go by anymore that I think that, if it was permanent, we would be able to house more of our chronically homeless clients because of their criminal criteria.”
- Allow for flexible age transition to ensure older adults can continue to be housed in the Mainstream program. The PHA leader explained, “Another one [waiver] would be for Mainstream eligibility. If we were able to house people who were [aged] 62 but not yet 63, we could assist more clients. Currently, without the waiver in place, we can’t house them if they are going to be 62 when the contract goes into effect....”
- Accept documentation and rent payments online. A tenant suggested that PHAs should accept documentation and rent payments online to alleviate logistical challenges. They explained, “People have to be able to, first of all, have a checking account, or if not, they have to have transportation to a bank or a place that offers money orders. Then, they need transportation to drop it off. Previously, you had to go to one specific property to pay it. Now, at least, they put a dropbox on another property. You don’t need a ride to their office anymore, but you still need a ride to get a money order or cashier’s check to drop into the dropbox. If that’s a HUD requirement, they should be more flexible. I don’t understand why, in today’s day and age, we can’t just go online and pay the bill.” It is important to note that accepting online payments and documentation is up to PHA policies and is not regulated or

⁷⁷ For more detailed information on the VASH-specific waivers, refer to the [Federal Register](https://www.federalregister.gov/documents/2021/09/27/2021-20734/section-8-housing-choice-vouchers-revised-implementation-of-the-hud-veterans-affairs-supportive) at: <https://www.federalregister.gov/documents/2021/09/27/2021-20734/section-8-housing-choice-vouchers-revised-implementation-of-the-hud-veterans-affairs-supportive>.

prohibited by HUD. HUD provides guidelines but allows PHAs the flexibility to implement procedures that best suit their operational capabilities and the needs of their tenants.

Overall, these recommended waivers aim to streamline the recertification process, reduce the administrative workload of PHAs, and minimize the inconvenience for residents, ultimately leading to more efficient and user-friendly service delivery. The researchers note that HUD is implementing some of the recommended waivers and considering others. On May 6, 2024, HUD published a final rule titled “Housing Opportunity Through Modernization Act of 2016 (HOTMA)—Housing Choice Voucher (HCV) and Project-Based Voucher [PBV] Implementation; Additional Streamlining Changes.”⁷⁸ This final rule implements many changes made by HOTMA to the HCV tenant-based program and the PBV program, including revisions on how PHAs calculate PBV portfolio caps. Regarding this change, “A PHA may project-base an additional 10 percent of its authorized voucher units at the time of commitment... [in certain instances]” (HUD, 2024). Much of this change was previously implemented via PIH Notice 2017-21, so references by PHA staff to increasing the PBV caps likely indicate a desire to raise caps to levels higher than those set by HOTMA.

HUD also has a new proposed rule to revise regulations governing the admission of applicants with criminal records or a history of involvement with the criminal justice system and the eviction or termination of assistance for persons based on illegal drug use, drug-related criminal activity, or other criminal activity. Under this proposed rule, PHAs must establish a “lookback period” that limits reliance on old convictions. This rule will consider prohibiting admission for more than 3 years after any criminal activity to be “presumptively unreasonable.”⁷⁹

⁷⁸ This final rule is available in the Federal Register at: <https://www.federalregister.gov/documents/2024/05/07/2024-08601/housing-opportunity-through-modernization-act-of-2016-housing-choice-voucher-hcv-and-project-based>.

⁷⁹ This proposed rule, titled, “Reducing Barriers to HUD-Assisted Housing” is available in the Federal Register at: <https://www.federalregister.gov/documents/2024/04/10/2024-06218/reducing-barriers-to-hud-assisted-housing>.

Chapter 5. Conclusion

This study provides key insights into the implementation efforts and outcomes of the Coronavirus Aid, Relief, and Economic Security (CARES) Act waivers on the operations of public housing agencies (PHAs) and assisted households. These insights can inform future policy and program implications related to PHA waivers and flexibilities beyond the expiration of the CARES Act waivers. The findings also highlight areas for future research, uncovering gaps in the administrative data regarding the measurement of waiver impacts. The researchers recap the study's key findings, describe the study's limitations, and suggest avenues for further inquiry.

5.1 Key Study Findings

5.1.1 PHA Implementation of CARES Act Waivers

During the pandemic, PHAs could not have maintained compliance with HUD policies without the aid of waivers. For most PHAs, this experience was their first time implementing waivers. The CARES Act significantly reduced the administrative burden of implementing waivers, making the process faster and easier. As a result, PHAs adopted more waivers than they otherwise would have. HUD provided guidance on waivers through Public and Indian Housing (PIH) Notices, their website, conferences organized for PHAs, and direct support from local and regional HUD offices. For some PHAs, this support was enough, but others wanted shorter, more accessible guidance from HUD that was focused on practical application rather than just information on policy changes.

Most PHAs followed a similar implementation process: reading PIH Notices; discussing available waivers with staff; consulting external stakeholders, such as their HUD field office, residents, and other PHAs; and presenting their decisions to their boards. Regional offices play a vital role in providing meaningful guidance to PHAs. Some regional offices successfully translated federal guidance into practical support. However, others were less successful. PHAs tracked waiver adoption using HUD-provided tracking sheets and their own internal documents. Despite these efforts, some PHAs struggled to keep up with HUD's changes to waiver expiration dates. Implementing waivers sometimes requires additional investments into technology, developing new processes, and enhancing residents' technological skills.

5.1.2 Trends and Characteristics of Waiver Implementation

Size, region, and program type all impacted the likelihood of a PHA adopting waivers. Small PHAs adopted waivers at a rate of 38.4 percent compared with 79.2 percent and 91.4 percent for their medium and large counterparts, respectively. Regionally, 85 percent of PHAs in the Far West and Beyond adopted waivers, whereas only 30.8 percent in the Southeast did so. Adoption rates varied across other regions: 68 percent in the Northeast, 56.8 percent in the Upper Midwest, 48.4 percent in the Southwest, and 38.9 percent in the Midwest. The Housing Choice Voucher (HCV) and combined HCV/Public Housing PHAs had

similar adoption rates at 68.2 and 69.2 percent, respectively, but only 24.6 percent of public housing-only PHAs adopted waivers. Moving to Work (MTW) agencies had higher adoption rates than non-MTW counterparts. PHAs that chose not to adopt any waivers cited reasons such as perceived lack of necessity, the temporary nature of waivers, existing workarounds, and the small size of their PHAs. Housing Quality Standards Inspections, HCV, and combined Public Housing and HCV were the only waiver categories with adoption rates above 50 percent. Housing Quality Standards (HQS) Quality Control Inspection, Oral Briefing, Extension of Voucher Term, and Initial Inspections Requirements waivers were the most adopted, with more than 65 percent adoption rates. Less than 8 percent of PHAs adopted Mainstream Voucher or Moderate Rehabilitation waivers.

5.1.3 Outcomes Resulting from Implementing CARES Act Waivers

The study identified the waivers that PHAs found most beneficial, revealing three main themes: (1) administrative flexibility, (2) reduced administrative burdens, and (3) help in adapting to external challenges. Key waivers included streamlining verification and documentation requirements, flexible inspection practices, and adaptations in HCV program operations. The CARES Act waivers significantly impacted PHA operations and services, benefiting PHAs and residents. For PHAs, the waivers ensured operational continuity and compliance and facilitated innovative practices that did not require waivers but were not widespread prior to the pandemic, such as remote inspections and briefings, reduced administrative burdens, and enhanced service delivery. For residents, the waivers improved housing stability and safety by streamlining processes, reducing eviction risks, and minimizing in-person interactions during the pandemic. They also enhanced access and efficiency for new applicants by expediting housing assistance and increasing the time allowed to navigate the competitive rental market. Expedited waivers helped PHAs by reducing administrative burdens and easing Section Eight Management Assessment Program (SEMAP) scoring. For residents, waivers extended the initial period for housing search, eased housing shortages, and offset rent increases. However, when waivers expired, PHAs faced inspection backlogs and compliance challenges, and tenants and PHAs struggled to return to pre-pandemic rules.

5.1.4 Future Policy and Program Implications

Most PHAs hoped to see at least one waiver continued. The most popular waivers PHAs recommended continuing were Income Verification Requirements and Recertification waivers, Community Service and Self-Sufficiency Requirement waivers, and Housing Quality Inspection waivers. PHAs had similar preferences for expedited waivers and were interested in continuing the Increased Payment Standard, Inspection Flexibilities, Income Verifications Flexibilities, and SEMAP waivers. Fewer PHAs identified waivers they thought should be discontinued, but waivers that were discussed included the HQS Inspection waivers, Delayed Annual Exams, and Extended Voucher Term Extensions waivers. The primary concerns regarding these waivers were a reduction in housing quality, administrative backlogs, and, in the case of Voucher Term Extensions, an increase in work and potentially slow contract times. PHAs suggested improving regulatory waivers by

simplifying the waiver process, offering tailored flexibilities for small and rural PHAs, publishing common waiver requests, and empowering local field offices to approve waiver requests and provide detailed information to PHAs. The PHAs also provided suggestions about additional waivers they would like to see HUD offer in the future. Examples include simplifying income verification and interim certifications, allowing discretion on interim certifications when income changes, using self-certification instead of bank statements, and reducing the frequency of annual recertifications for residents on fixed incomes.

5.2 Limitations of the Study and Areas for Future Research

Although the study has provided important insights into the implementation and outcomes of the CARES Act waivers, researchers recognize that limitations exist in the scope of the study. Limitations include the following—

- **Non-Representativeness of the Sample:** The researchers selected 59 PHAs across the country to participate in telephone interviews by using a purposeful stratified sampling procedure. The PHAs were grouped by characteristics to ensure a diverse sample. The purposeful nature of the sampling means that certain types of PHAs might be overrepresented or underrepresented, which could skew the results. Therefore, although the study provides detailed insights into the experiences of the selected PHAs, the findings cannot be generalized to all PHAs.
- **Recall Bias:** The CARES Act waivers were authorized in 2020, with many waivers expiring in 2021. The interviews for this study were conducted in 2023, resulting in a 2-year gap between the implementation of the waivers and the collection of qualitative data. This time gap may introduce recall bias, as some PHAs struggled to remember specific details about the waivers they adopted and their experiences during the waiver period. During the interviews, many PHAs reported high staff turnover within their agencies. They explained that many of the leadership, staff, and Resident Advisory Board members who had been involved in implementing the waivers were no longer with the agency at the time of the interviews. As a result, the study could not capture the perspectives of these individuals, potentially leading to incomplete accounts of the waiver implementation and its impacts.
- **Limited Perspective of Assisted Households:** The researchers completed 12 resident interviews, which was fewer than anticipated. Some PHAs thought residents lacked knowledge about the waivers, were unable to find willing participants, or had no current Resident Advisory Board members remaining from the pandemic period. Six small and extra-small PHAs stated that, due to minimal staff and resources, they did not have Resident Advisory Boards established. Interviewed residents were aware of some changes but did not link their experiences to any of the waivers or their impacts. Residents mostly discussed the quarantine, their isolation, and how their PHAs provided materials, personal protective equipment, food, and other support.

When asked specific questions about the waivers, such as regarding changes in inspections and documentation, residents mentioned that COVID-19 protocols, like

social distancing, meant they did not deal with inspections and often submitted documents virtually or not at all. Despite the researchers' efforts, residents struggled to provide details specifically about the waivers. Recall bias and assisted household turnover also impacted their ability to capture the perspectives of assisted households. Future research should be conducted sooner to mitigate this limitation. Researchers should also involve the target population by requesting that PHAs identify assisted households for interviews at the beginning of the process rather than at the end. This approach would provide PHAs with more time to identify residents willing to participate.

Despite these limitations, the study offers valuable contributions to understanding the effects of the CARES Act waivers on PHA operations and assisted households. Above all, the findings show that most PHAs thought the CARES Act waivers were useful and would like to see them continued, ideally through a simplified waiver process. As HUD continues to provide flexibilities through the Housing Opportunity Through Modernization Act (HOTMA) and considers additional flexibilities, these findings offer HUD a foundation for policy development. The findings also provide direction for future research to further improve HUD's waiver process and options for the benefit of PHAs and the households they serve.

Appendix A. Research Questions and Participating Public Housing Agencies (PHAs)

This appendix presents—

- The study’s research questions (see **exhibit A.1**).
- A list of all the PHAs that participated in the qualitative interviews (see **exhibit A.2**).

Exhibit A.1 | Research Questions Addressed in the Final Report and Associated Data Sources

Research Questions (RQs)	Document Review	PHA Interviews	Quantitative Data	
			CAWRT Survey Data	Administrative Data
Implementation				
RQ1. What pre-existing programs or initiatives led to or influenced the authorization and implementation of PHA waivers offered by the CARES Act?	ü	ü		
RQ2. Prior to the CARES Act, what kind of waivers and flexibilities were available to PHAs?	ü	ü		ü
RQ3. What was the process for implementing and utilizing the waivers offered by the CARES Act?	ü	ü		
RQ4. What HUD guidance and support were available for PHAs for implementing waivers offered by the CARES Act, and how were the guidance and support provided?	ü	ü		
RQ5. How did the authorization of the CARES Act change how PHAs implemented waivers?	ü	ü		
RQ6. How did PHAs and HUD track the implementation of waivers?	ü	ü		
Trends and Characteristics				
RQ7. Which waivers offered by the CARES Act were the least and most adopted, and why did PHAs tend to utilize some of these waivers more than others?		ü	ü	
RQ8. What are the characteristics of PHAs that utilized waivers offered by the CARES Act and those that did not utilize these waivers?			ü	
RQ9. How did Moving to Work (MTW) PHAs utilize waivers compared to non-MTW PHAs?			ü	
RQ10. Why did some PHAs decline the utilization of all waivers offered by the CARES Act, and what were the characteristics of these PHAs?		ü	ü	
Outcomes				
RQ11. Based on available evidence, how (if at all) did waivers authorized by the CARES Act benefit assisted households?		ü		
RQ12. Based on available evidence, how (if at all) did the waivers authorized by the CARES Act negatively affect assisted households?		ü		
RQ13. How did waivers authorized by the CARES Act affect service delivery models and general PHA operations?		ü		ü
a. How did these waivers affect quality of services and operations?		ü		ü
b. How did these waivers affect PHA workload?		ü		ü

Research Questions (RQs)	Document Review	PHA Interviews	Quantitative Data	
			CAWRT Survey Data	Administrative Data
RQ14. How did waivers offered by the CARES Act change PHA reporting of administrative data? How did related changes (if any) affect program and performance monitoring?		ü		ü
RQ15. How did additional PHA funding offered by the CARES Act (such as increased operating subsidies for Public Housing and increased administrative fees for HCV) affect how PHA adopted or implemented waivers?		ü		
RQ16. How did the expiration of waivers authorized by the CARES Act affect PHAs and assisted households?		ü		
RQ17. How did the removal of HUD's review and approval process for waivers authorized by the CARES Act affect PHAs? What were the related challenges and benefits?		ü		
RQ18. How did HUD efforts to continue some of the flexibilities offered by the CARES Act (for example, the expedited regulatory waivers) affect PHAs and assisted households?		ü		
Policy and Program Implications				
RQ19. Which waivers would PHAs like to consider continuing through regulatory and statutory changes?		ü		
RQ19. a. What are the reasons for wanting to continue waivers? How would continuing the waivers benefit PHA operations or assisted households? How would discontinuing the waivers harm PHA operations or assisted households?		ü		
RQ19. b. What modifications (if any) would PHAs want to make to the waivers offered by the CARES Act if continued?		ü		
RQ19. c. Are there any waivers PHAs would want discontinued through regulatory and statutory changes? If so, which ones and why?		ü		
RQ20. How can HUD improve PHA flexibilities (for example, waivers offered by the CARES Act) that do not require new legislation or congressional authorization?		ü		
RQ21. How can HUD improve regulatory waivers offered to PHAs? Are expedited regulatory waivers a good continuation or alternative to the waivers offered by the CARES Act?		ü		

CARES Act = Coronavirus Aid, Relief, and Economic Security Act. CAWRT = CARES Act Waiver Reporting Tool. HCV = Housing Choice Voucher. PHAs = public housing agencies.

Notes: ü represents that this data source addresses the associated research question.

Exhibit A.2 | List of Interviewed Public Housing Agencies (PHAs)

PHA Code	PHA Name	PHA Code	PHA Name
AL116	York Housing Authority	ND019	Traill County Housing Authority
AR037	Housing Authority of The City of Prescott	NE094	York Housing Authority
AR059	Brinkley Housing Authority	NE104	Columbus Housing Authority
AR093	Hickory Ridge Housing Authority	NJ051	Glassboro Housing Authority
AR197	White River Regional	NY016	Binghamton Housing Authority
AR200	Harrison Housing Authority	NY060	Amsterdam Housing Authority
AZ006	Flagstaff Housing Authority	OH081	Brown Metropolitan Housing Authority
CA008	Housing Authority of the County of Kern	OR006	Homes for Good Housing Authority
CA094	Orange County	OR014	Marion County Housing Authority
CA123	Pomona Housing Authority	PA006	Allegheny County Housing Authority
CO050	ARVADA	SC007	Aiken Housing Authority
CT023	Bristol Housing Authority	TN003	KCDC (Knoxville's Community Development Corporation)
DC001	D.C Housing Authority	TN005	MDHA-Nashville (Metropolitan Development and Housing Agency)
FL002	St. Petersburg	TX010	Waco Housing Authority
FL010	Ft. Lauderdale	TX028	McAllen Housing Authority
FL030	Flagler County Housing Authority	TX030	Temple Housing Authority

PHA Code	PHA Name	PHA Code	PHA Name
FL053	Milton Housing Authority	TX080	Anson Housing Authority
GA006	Atlanta Housing Authority	TX457	Marshall Housing Authority
IL069	Clark County Housing Authority	UT025	West Valley City Housing Authority
IL116	McHenry County Housing Authority	UT026	Logan City Housing Authority
IN041	Marion Housing Authority	VA019	Fairfax County RHA
IN067	Knox County Housing Authority	VA023	Staunton Redevelopment HA
LA238	Covington Housing Authority	VT002	Brattleboro Housing Authority
MA091	Hudson Housing Authority	VT003	Rutland Housing Authority
MA118	Danvers Housing Authority	WA004	Peninsula Housing Authority
ME002	Fort Fairfield Housing Authority	WA025	Bellingham & Whatcom County Housing Authority
ME021	Brewer Housing Authority	WV005	Parkersburg Housing Authority
MI074	Mount Pleasant Housing Commission	WV017	Pt. Pleasant Housing Authority
MO107	Carrolton Housing Authority	WY002	Housing Authority of The City of Cheyenne
NC012	Housing Authority of The City of Winston-Salem		

Appendix B. Sample Development

This appendix details the sampling procedure the researchers used to select the original 50 PHAs to participate in the study. In the following sections, researchers provide a brief introduction of the sampling frame and the approach used to select samples (and back-ups) for public housing agencies (PHAs) that adopted at least one of the Coronavirus Aid, Relief, and Economic Security (CARES) Act waivers and PHAs that did not utilize any of the CARES Act waivers.

Sampling Frame

HUD provided 2M Research with two data files from which they constructed a sampling frame for the study. The CARES Act Waiver Reporting Tool (CAWRT) survey dataset provided a base file of 3,217 PHAs that recorded information on the types of waivers each PHA adopted.⁸⁰ The second file (4,388 records) provided information on the characteristics of all PHAs, including PHA size, region, program type, and Moving to Work (MTW) status. 2M Research merged the two datasets, which resulted in a final sampling frame of 3,214 PHAs from which the sample was selected.

To address the study objectives, the researchers further divided the sampling frame into two data frames:

- PHAs that adopted at least one waiver offered by the CARES Act (comprising 1,644 PHAs).
- PHAs that did not utilize any of the CARES Act waivers (comprising 1,570 PHAs).

Sample

2M Research constructed the sample with a stratified purposeful sampling procedure based on several criteria, including geographic regions,⁸¹ PHA sizes, the types of programs administered, and MTW status. The overarching sampling goal was to select a sample of PHAs that represented the characteristics of interest and aligned with the research questions. Because most of the research questions are directed toward the PHAs that adopted at least one waiver, most of the sample consists of these PHAs, including 45 out of the 50 PHAs. The remaining five PHAs represent those that did not adopt any waiver. The rationale for including these five PHAs is to answer the research question: “*Why did some PHAs decline the utilization of all waivers offered by the CARES Act, and what were the characteristics of these PHAs?*” In addition to the 50 PHAs, 2M Research drew backups for the sample of PHAs that adopted at least one waiver (10 PHAs) and those that did not adopt

⁸⁰ The Public and Indian Housing (PIH) Notice PIH 2021-33 (HA) required all PHAs (including MTW agencies) to record information regarding which waivers the PHA had chosen to implement into CAWRT.

<https://www.hud.gov/sites/dfiles/OCHCO/documents/2021-33pihn.pdf>

⁸¹ The geographic regions are based on the regions identified on the CAWRT Dashboard:

https://www.hud.gov/program_offices/public_indian_housing/covid_19_resources/cawrt_data_dashboard.

any waiver (5 PHAs), respectively. The researchers describe their sampling approach in the next section.

Sampling Approach for PHAs that Adopted at Least One CARES Act Waiver

Among the PHAs that adopted at least one of the CARES Act Waivers, the number of PHAs varied across different strata (**see exhibit B.1**), with some strata having a very small number of PHAs. For example, the *extra-large* stratum in the PHA size criterion has only four PHAs, and as a result, 2M Research merged this stratum into the *large* stratum to ensure an appropriate number of PHAs were selected from these two strata. The Y and Y-*Expansion* strata in the MTW status criterion have 39 and 16 PHAs, respectively. 2M Research decided to keep the two different strata in this case and selected one sample from each stratum to ensure adequate representation in the final sample.

Exhibit B.1 | Criteria for Sampling PHAs that Adopted at Least One Waiver

Category	Sub-category
Region	Northeast
	Southeast
	Upper Midwest
	Southwest
	Midwest
	Far West and Beyond
Program Type	Combined (PHAs that have both Public Housing and HCV programs)
	HCV Only
	Public Housing Only
PHA Size	Extra-Small (0-249)
	Small (250-549)
	Medium (550-4,999)
	Large (5,000-57,999)
	Extra-Large (58,000 or Larger)
MTW Status	N
	Y - Initial MTW agency
	Y - MTW Expansion agency

HCV = Housing Choice Voucher. MTW = Moving to Work. N = no. PHAs = public housing agencies. Y = yes.

The first stage of constructing the sample for the PHAs that adopted at least one CARES Act waiver was to divide the sampling frame into three sub-sampling frames based on the MTW status criterion:

1. MTW PHAs sampling frame: 39 PHAs.
2. Expansion MTW PHAs sampling frame: 16 PHAs.
3. Non-MTW PHAs sampling frame: 1,589 PHAs.

2M Research then randomly selected two PHAs (with one serving as a backup) from the traditional MTW PHAs sampling frame and the MTW expansion PHAs sampling frame, respectively. Next, the researchers developed 66 strata across the geographic regions, program types, and PHA sizes for the non-MTW PHAs sampling frame. The number of PHAs in each subgroup/strata varied substantially among the non-MTW PHAs group. For example, the subgroup *Northeast region, Combined program type, Medium PHA size, and non-MTW* had the largest (152) number of PHAs, whereas seven subgroups had only one PHA. To better represent the population, 2M constructed the sample for the non-MTW PHAs using the approach described in **exhibit B.2**. Specifically, the researchers divided the 66 subgroups into seven categories based on their number of PHAs, and then randomly drew a different number of PHAs (and backup PHAs) from each subgroup. Please note that the Midwest region was underrepresented with this sampling approach. To slightly boost the sample size in the Midwest region, the researchers updated the sampling method for the last category by randomly drawing two PHAs from eight subgroups in the Midwest region and then one PHA from the 39 subgroups, with the two selected subgroups excluded.

Exhibit B.2 | Sampling Approach for PHAs that Adopted at Least One CARES Act Waiver

Number of PHAs in a Strata	Number of Strata	Number of PHAs sampled within the Strata
110 <= number of PHA < 160	1	4 PHAs sampled for each subgroup
100 <= number of PHA < 110	1	3 PHAs sampled for each subgroup
90 <= number of PHA < 100	1	2 PHAs sampled, 1 PHA backup sampled for each subgroup
40 <= number of PHA < 90	9	2 PHAs sampled for each subgroup
number of PHA = 40	2	1 PHA sampled, 1 backup sampled for each subgroup
20 <= number of PHA < 40	11	1 PHA sampled for each subgroup

1 ≤ number of PHA < 20	41	3 PHAs sampled and 5 backup PHAs sampled from the 41 subgroups.
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CARES Act = Coronavirus Aid, Relief, and Economic Security Act. PHAs = public housing agencies.

Sampling Approach for PHAs that did not Utilize any CARES Act Waivers

Among the 1,570 PHAs that did not utilize any of the CARES Act waivers, about 88 percent of them were small or extremely small PHAs, with the rest comprising medium and large PHAs. As a result (and because the sample size for this group is relatively small), the sampling criteria for this group favored small PHAs. Following discussions with HUD, 2M decided to select three small PHAs, one medium PHA, and one large PHA for this group. The sampling process started with splitting the sampling frame into three sub-sampling frames based on the PHA size criterion, as shown in **exhibit B.3**. Next, the researchers selected three PHAs and three backup PHAs from the small or extra small PHA sampling frame and one PHA and one backup PHA from the medium and large PHA sampling frames, respectively.

Another important consideration was ensuring that the PHAs sampled for this group were in close proximity to the sample of PHAs that adopted at least one waiver. This measure was meant to ensure that the researchers would be able to control for some of the variability of the environment within which PHAs operate, especially given that there may have been local or regional conditions influencing PHAs in similar ways, regardless of PHA size. In this regard, the researchers repeated the sampling process several times until this requirement was satisfied. The geographic location information (for example, field office and state) of PHAs was used to check whether the sampled PHAs that did not utilize any waiver were geographically close to any of the sampled PHAs that adopted at least one waiver.

Exhibit B.3 | Sampling Approach for PHAs That Did Not Adopt CARES Act Waivers

Category	Number of PHAs in Frame	Number of PHAs sampled within that Strata
Small or extremely small PHA	1,385	3 samples, 3 backup samples
Medium PHA	174	1 sample, 1 backup sample
Large PHA	11	1 sample, 1 backup sample

CARES Act = Coronavirus Aid, Relief, and Economic Security Act. PHAs = public housing agencies.

Appendix C. Data Collection Instruments

Leadership Interview Protocol for PHAs that Adopted a Waiver

Section 1. Respondent Background

I'd like to start by learning a bit more about your role as it relates to the PHA [public housing agency]. Can you describe your role at the PHA and your experience with the CARES [Coronavirus Aid, Relief, and Economic Security] Act waivers?

Section 2. Context and Background

Next, I'd like to ask a few questions to understand more about the waivers your PHA used and the factors that informed your PHA's decision to adopt a particular waiver.

1. We understand that your PHA adopted the following CARES Act waivers –<Interviewer to read out the waivers>. Does this sound correct?
 - a. Why did your PHA decide to adopt these waivers?
 - b. What internal processes did your PHA go through to determine the type of CARES Act waivers you adopted?

2. What were the key factors your PHA considered when deciding which CARES Act waivers to adopt?

Probe for the following, if needed:

- a. Could you explain how the type of program your PHA administers (for example, Public Housing, HCV [Housing Choice Voucher], or both) impacted the waivers you adopted?
 - b. How did additional PHA funding offered by the CARES Act (such as increased operating subsidies for Public Housing and increased administrative fees for Housing Choice Vouchers) affect how your PHA adopted waivers?
3. We understand that certain regulatory waivers have been available to PHAs for a long time prior to the CARES Act waivers. These waivers require HUD's review and approval before their implementation. In the last five years prior to the CARES Act waivers, did your PHA request and receive approval for any waivers?

If yes, follow up with–

- a. Could you provide the kind of regulatory waiver requests that were granted to your PHA?
 - b. What were the reasons for applying for those regulatory waiver requests?
 - c. How did the implementation of those waivers impact the kind of CARES Act waivers you adopted?

If no, follow up with:

- a. Why did you not submit any regulatory waiver requests?

Probe for the following, if needed:

- Were you aware that PHAs could request regulatory waivers?
- Were you aware of the process for PHAs to request regulatory waivers?
- Did you believe that HUD would not grant your regulatory waiver request?
- Did you request a waiver that HUD did not grant approval for? What was that waiver request?
- If you requested a waiver but HUD did not grant approval, was your waiver request one that HUD did not have the authority to grant (for example, it was statutory in nature)?

Section 3. Implementation of Waivers

Next, I'd like to go into a bit more detail about the process your PHA went through to implement the CARES Act waivers you adopted as well as the kind of support or guidance you received from HUD for implementing those waivers.

4. Can you describe the process your PHA went through to implement the CARES Act waivers you adopted?

Probe for the following examples, if needed:

- Process to notify residents and owners of any impacts the waivers may have on them (for example, through PHA's website, voicemail message, or formal written notice).
 - Engagement with your board, if at all?
 - Any public engagement processes that the agency went through.
 - Training staff on how to implement the waiver.
 - Planning for future expiration of the waiver.
 - Any community or resident pushback.
 - In communicating the impacts of the waivers to your residents and program participants, what steps, if any, did you take to ensure meaningful access by Limited English Proficient (LEP) individuals?
5. What challenges did your PHA experience with the implementation of the CARES Act waivers, including challenges related to internal PHA decisions, HUD requirements, and community concerns?

6. What HUD guidance and support were available to your PHA for implementing the CARES Act waivers you adopted?
- [If you received HUD guidance]** How were guidance and support provided to your PHA?
 - [If you received HUD guidance]** How did the guidance and support help your PHA to address the challenges you identified in Question 5?
 - Was there additional support your PHA received from other entities and organizations?
[Probe for] the name of entities and the kind of additional support they provided.
 - Was there any additional guidance or support that would have been helpful to your PHA for implementing the CARES Act waivers?
7. PHAs were required to keep written documentation on the CARES Act waivers applied as well as the effective dates. How did your PHA track the waivers you used?
- Probe for the following examples, if needed:**
- HUD-recommended format for recommending waivers in the form of Attachment I of PIH [Public and Indian Housing] Notices.
 - Any other methods you used to track the implementation.
8. PHAs did not need to notify HUD or receive HUD approval to begin using the CARES Act waivers/alternative requirements. To what extent did the removal of HUD's review and approval process affect the implementation of the waivers you adopted?
- Probe for the following examples, if needed:**
- Benefits related to the removal of HUD's review and approval process.
 - Any challenges PHA faced with the removal of HUD's review and approval process.
9. HUD made efforts to continue some of the flexibilities offered by the CARES Act, such as expedited regulatory waivers. Did your PHA submit requests for any of the expedited regulatory waivers?
- Probe for the following, if your PHA submitted requests:**
- What expedited regulatory waivers did you receive approval for?
 - Why did your PHA request these waivers?
 - What *good cause* reasons did you cite to justify your request(s)?
 - Were there CARES Act waivers that you believe HUD should have continued through the expedited regulatory waiver process?
10. Which of the CARES Act waivers that your PHA adopted and used did you find the most useful for your overall operational effectiveness in serving residents and clients during the pandemic? How were the adopted waivers useful?

[Note to interviewer: Be prepared to refer respondents to the list of CARES Act waivers they confirmed their PHAs adopted in Question 1.]

Section 4. Policy and Program Implications

I would now like to discuss any recommendations you may have for improvement, expansion, and sustainability of regulatory flexibilities available to PHAs.

11. Which of the waivers that were offered by the CARES Act would you like to become permanent?

Probe for the following if the respondent expressed a desire for the waivers to continue:

- a. For each of the CARES Act waivers mentioned, what are the particular reasons for wanting to continue each of those specific waivers?
 - b. How would continuing each of the CARES Act waivers mentioned benefit your PHA operations or assisted households?
 - c. How would discontinuing the CARES Act waivers harm PHA operations or assisted households?
12. For those CARES Act waivers that you would like to see become permanent, what modifications (if any) would you want made to the waiver for improvement?
13. Are there any CARES Act waivers that your PHA did not find to be particularly useful and would not pursue if they were continued through regulatory and statutory changes?

If yes, follow up with:

- a. Which CARES Act waivers would you want to discontinue?
 - b. What are your reasons for wanting to discontinue these CARES Act waivers?
14. How could HUD improve PHA flexibilities through additional waivers?
- a. Would you consider the expedited regulatory waivers a good continuation or alternative to the waivers offered by the CARES Act? If yes, then how?
 - b. How could HUD improve the processes related to regulatory waivers offered to PHAs?

Section 5. Closing

15. Is there any other important information that might help us better understand your implementation of the CARES Act waivers, and how it impacted your operations and residents?

Those are all the questions we have. Is there anything else you'd like to share that we have not asked about?

Operation Staff Interview Protocol for PHAs that Adopted a Waiver

Section 1. Respondent Background

I'd like to start by learning a bit more about your role as it relates to the PHA. Can you describe your role at the PHA and your experience with the CARES Act waivers?

Section 2. Context and Background

Next, I'd like to ask a few questions to understand more about the waivers your PHA used and the factors that informed your PHA's decision to adopt a particular waiver.

1. We understand the CARES Act waivers your PHA adopted are the following__ <interviewer to read out the waivers> __. Does this sound correct?
2. What initial challenges (for example, challenges to service provision and the barriers to maintaining normal operations) did your PHA experience as a result of the COVID-19 pandemic?

Probe for the following examples, if needed:

- Can you please describe if there were any challenges related to collecting documentation for potential program participants in order to enroll them into federal rental assistance programs?
- Can you please describe if there were any challenges with your PHA's ability to obtain information related to changes in income or employment?
- Can you please describe if there were any challenges with your PHA's ability to maintain in-person inspection of units?
- Can you please describe if there were any challenges with your PHA staff's ability to meet in person with program participants for certain briefings?

Section 3. Perceived Outcomes

I would now like to discuss how the implementation of the CARES Act waivers impacted your PHA's services, operations, and the assisted households you serve.

3. Which of the waivers that your PHA adopted and used did you find the most useful for your overall operational effectiveness in serving residents and clients during the pandemic? How were the adopted waivers useful?

[Note to interviewer: Be prepared to refer respondents to the list of waivers they confirmed their PHAs adopted in Question 1.]

4. [Note to interviewer: Cycle through the probes in this question for each type of waivers that the respondent identified in Question 3.] For the next set of questions in this section, I would like to understand in more detail how each of the CARES Act waivers identified as useful impacted or benefited your PHA's operations and assisted households.

- a. In your opinion, how did __<Waiver Name> __benefit or negatively affect your residents?

Probe for the following examples, if needed:

- How did the waivers affect applicant or assisted households to meet requirements for the program?
- How did the waivers affect assisted households' housing situations?
- How did the waivers affect the time it took to determine income?
- How did the waivers affect potential households to access federal rental assistance?
- How did the waivers affect program participants achieving self-sufficiency? [Note to interviewer: Ask if PHA utilized FSS {Family Self-Sufficiency} waivers.]
- How did the waivers affect your PHA's ability to serve foster youth? [Note to interviewer: Ask if PHA utilized FUP {Family Unification Program} waivers.]
- How did the waivers affect your PHA's ability to serve non-elderly people with disabilities? [Note to interviewer: Ask if PHA utilized Mainstream waivers.]

- b. How did __<Waiver Name> __affect your PHAs' ability to provide services for residents?

- How did the waivers affect the time between household application and the household receiving assistance?
- How did the waivers affect the utilization of vouchers and lease-up?
- How did the waivers affect the success rates for vouchers?
- How did the waivers affect the ability of landlords to participate in the voucher program?
- How did the waivers affect PHA staff's ability to provide customer service?

- c. How did __<Waiver Name> __ help to streamline or improve your PHA's general operations other than service delivery?
- How did the waivers affect supply of affordable housing? [Note to interviewer: Ask if PHA utilized PBV {Project-Based Voucher} waivers.]
 - How did the waivers affect recertification and other income examination processes? [Note to interviewer: this is related to virtual inspections.]
 - How did the waivers affect evictions (for example, over-income households in public housing)?
 - How did the waivers affect any requirements for community service (for example, Community Service and Self-Sufficiency Requirement Suspension Waiver in Public Housing)?
- d. How did __<Waiver Name> __ change your PHA reporting of administrative data (if at all)?
- How did the related changes (if any) affect your PHA's program and monitoring performance?
5. HUD made efforts to continue some of the flexibilities offered by the CARES Act, such as expedited regulatory waivers. Did your PHA submit requests for any of the expedited regulatory waivers?
- Probe for the following, if PHA submitted requests:
- What expedited regulatory waivers did your PHA receive approval for?
 - Why did your PHA request these waivers?
 - How did the expedited regulatory waivers affect your PHA's operations and residents?
 - Were there CARES Act waivers that you believe HUD should have continued through the expedited regulatory waiver process?
6. What other impacts (if any) did the implementation of the CARES Act waivers have on your PHA's general operations and residents?
7. Did you notice any successes resulting from the waivers offered by the Cares Act? If so, what were they?
8. Did you notice any challenges resulting from the waivers offered by the Cares Act? If so, what were they?
9. Can you describe any lessons learned from the implementation of the waivers?

Section 4. Policy and Program Implications

I would now like to discuss any recommendations you may have for improvement, expansion, and sustainability of regulatory flexibilities available to PHAs.

10. Which of the waivers that were offered by the CARES Act would you like to become permanent (if any)?

Probe for the following if the respondent expressed a desire for the waivers to continue:

- a. For each of the waivers mentioned, what are the particular reasons for wanting to continue each of those specific waivers?
 - b. How would continuing each of the waivers mentioned benefit your PHA operations or assisted households?
 - c. How would discontinuing the waivers harm PHA operations or assisted households?
11. For those CARES Act waivers that you would like to see become permanent, what modifications (if any) would you want made to the waiver for improvement?
12. Are there any CARES Act waivers that your PHA did not find to be particularly useful and would not pursue if they were continued through regulatory and statutory changes?

If yes, follow up with:

- a. Which waivers would you want to discontinue?
- b. What are your reasons for wanting to discontinue these waivers?

Section 5. Closing

13. Is there any other important information that might help us better understand your implementation of the CARES Act waivers, and how it impacted your operations and residents?
14. Those are all the questions we have. Is there anything else you'd like to share that we have not asked about?

Resident Advisory Board or Resident Interview Protocol for PHAs that Adopted a Waiver

Section 1. Respondent Background

I'd like to start by learning a bit more about your role as it relates to the resident advisory board. Can you describe your role at the resident advisory board and your experience with the CARES Act waivers?

Section 2. Context and Background

Next, I'd like to ask a few questions to understand more about the waivers your PHA used and the involvement of the Resident Advisory Board in the implementation of the waivers.

1. The CARES Act waivers your PHA adopted include the following__<interviewer to read out the waivers> __.

- a. Did you realize that these waivers were in place in your PHA?
- b. If yes, what specifically made you aware of it?

2. In what ways (if at all) were members of the Resident Advisory Board involved in the process to implement waivers offered by the CARES Act?

Probe for the following, if needed:

- a. Notification of the waivers and their effect.
- b. Selection of waivers.
- c. Assistance in resident understanding of the waivers (including for individuals with Limited English Proficiency [LEP]).
- d. Understanding when waivers were extended or expired.

3. What challenges related to your housing did residents experience because of the COVID-19 pandemic?

Probe for the following, if needed:

- How did the waivers affect residents' ability to meet requirements or find appropriate documentation for the program?
- How did the waivers affect potential households' access to federal rental assistance?
- How did the waivers affect residents' ability to meet rental payments?
- How did the waivers affect the time it took to find a unit for new residents?
- How did the waivers affect the utilization of vouchers and lease-up?
- How did the waivers affect the success rates for vouchers?
- How did the waivers affect the time it took to conduct unit maintenance and upkeep?
- How did the waivers affect the time it took to determine income?
- How did the waivers affect residents' housing situations?
- How did the waivers affect residents during re-examinations?
- How did the waivers affect PHA staff's ability to provide customer service to residents?
- How did the waivers affect residents achieving self-sufficiency? [Note to interviewer: Ask if PHA utilized FSS waivers.]

4. How did residents and/or PHA leadership and staff respond to these challenges?

5. [Note to interviewer: Ask this question if respondent indicated in Question 1 that they were unaware of the CARES Act waivers.] What did your PHA do differently during the pandemic?

- a. Of the things your PHA did differently, which were helpful to you, and why?
- b. What are things your PHA did during the pandemic that you would like to see continue, and why?

[Note to interviewer: **If respondent indicated in Question 1 that they are unaware of any of the CARES Act waivers their PHA adopted, please move to the last question in Section 5. Closing.**]

Section 3. Perceived Outcomes

I would now like to discuss how the implementation of the CARES Act waivers impacted your residents.

6. Which of the CARES Act waivers that the PHA implemented did you find the most useful for residents during the pandemic? How were the adopted waivers useful?

[Note to interviewer: Be prepared to refer respondents to the list of waivers PHAs adopted based on conversations with PHA Leadership and Operations Staff.]

7. [Note to interviewer: Cycle through the probes in this question for each type of waivers that the respondent knew about in Question 1.] For the next set of questions in this section, I would like to understand in more detail how each of the waivers identified as useful impacted residents and assisted households.

- a. In your opinion, how did __<Waiver Name>__ benefit residents?
- b. In your opinion, how did __<Waiver Name>__ negatively affect your residents?

8. What other impacts did the implementation of the waivers have on residents?

Section 4. Policy and Program Implications

I would now like to discuss any recommendations you may have for improvement, expansion, and sustainability of waivers, beyond the CARES Act.

9. Which of the CARES Act waivers that your PHA implemented would you like to become permanent?

Probe for the following if the respondent expressed a desire for the waivers to continue:

- a. What are the reasons for wanting to continue these waivers?
- b. How would continuing these waivers benefit residents?

10. Are there any CARES Act waivers that your residents did not find to be particularly useful and would not want your PHA to pursue if they were continued?

If yes, follow up with:

- a. Which waivers would you want to discontinue?
- b. What are your reasons for wanting to discontinue these waivers?

Section 5. Closing

11. Is there any other important information that might help us better understand the implementation of the CARES Act waivers and how it impacted residents?
12. Those are all the questions we have. Is there anything else you'd like to share that we have not asked about?

Leadership Interview Protocol for PHAs that did not Adopt a Waiver

Section 1. Respondent Background

I'd like to start by learning a bit more about your role as it relates to the PHA.

Section 2. Reasons for Declining to Adopt Waivers (Possible Respondent – PHA Leadership)

1. We understand that your PHA declined to adopt any of the waivers offered by the CARES Act. Is this correct?
2. What key factors caused your PHA to decline the use of these waivers?

Probe for the following, if needed:

- Was there anything related to the Notice announcing the waivers or the requirement of waivers themselves that affected your decision to decline the use of the PHA CARES Act waivers?
 - Was there anything related to the PHA operations at that time that affected your decision to decline the use of PHA CARES Act waivers?
3. Between 2020 and 2021, HUD published a series of Notices that established the waivers provided under the CARES Act waivers and enabled PHAs to immediately implement any of the waivers at their own discretion. Did your PHA review any of these Notices?

If yes, probe for the following:

- a. Was there anything about the Notices that affected your PHA's decision to decline adoption of the CARES Act waivers? If so, how?
 - b. Did your PHA understand the CARES Act waivers and how to adopt them as described in the HUD published Notices?
 - c. We understand that in addition to the Notices, HUD held webinars for PHAs about the CARES Act waivers. Did your staff from your PHA attend any of these webinars?
4. What additional subsidies did your PHA receive during the pandemic (for example, from the CARES Act)?

Probe for the following if PHA received any subsidy during the pandemic:

- a. Did the subsidies affect your PHA's decision to decline a waiver?
- b. **[If yes]** In what ways did the subsidies affect your PHA's decision to decline adoption of any CARES Act waivers?

5. In the last five years or so prior to the CARES Act waivers, did your PHA request and receive approval for any regulatory waivers?
 - a. **[If yes]** Could you elaborate on the kind of regulatory waiver requests that were granted to your PHA?
 - b. **[If yes]** What were the reasons for applying for those regulatory waiver requests?
 - c. **[If yes]** Did the availability of these waivers affect your PHA's decision to decline adoption of the CARES Act waivers?
 - d. **[If yes]** Did the implementation of those waivers in any way impact your PHA's decision to decline adoption of the CARES Act waivers? If so, how?
6. Would your PHA have adopted a CARES Act waiver if the process for implementation and related requirements were different?
 - a. **[If yes]** What changes would you have preferred to see in the process and requirements related to the CARES Act waivers?
 - b. What additional guidance or support would have been helpful to your PHA in adopting a waiver?
7. HUD made efforts to continue some of the flexibilities offered by the CARES Act, such as expedited regulatory waivers. Did your PHA submit requests for any of the expedited regulatory waivers?
8. **Probe for the following if PHA submitted requests:**
 - If yes, how did the expedited regulatory waivers affect your PHA's operations and residents?
 - Why did your PHA pursue these waivers after deciding to decline adoption of any of the CARES Act waivers?
9. In your opinion, how could HUD improve the processes related to waivers offered to PHAs?

Section 4. Closing

10. Is there any other important information that will help us better understand your PHA's decision to decline adoption of any of the CARES Act waivers?
11. Those are all the questions we have. Is there anything else you'd like to share that we have not asked about?

Appendix D. Supplemental Tables

Exhibit D.1 shows the adoption rate of waivers by category, and **exhibit D.2** shows the waiver adoption rate by Moving to Work (MTV) status.

Exhibit D.1 | Waiver Adoption Rate by Waiver Categories

Waiver Categories	Waiver Sub-categories	Overall Adoption Rate (among Public Housing Agencies [PHAs] that Adopted at least One Waiver) (%)	Adoption Rate within Waiver Categories (%)
Public Housing (PH) and Housing Choice Voucher (HCV) Program Waivers	PH and HCV-3: Family Income and Composition: Annual Reexamination; Income Verification Requirements waiver	61.	67.0
	PH and HCV-4: Family Income and Composition: Interim Reexaminations waiver	58.7	63.6
	PH and HCV-5: Enterprise Income Verification (EIV) Monitoring waiver	45.8	49.6
	PH and HCV-2: Family Income and Composition: Delayed Annual Reexaminations waiver	45.1	48.8
	PH and HCV-1: PHA 5-Year and Annual Plan Submission Dates: Significant Amendment Requirements waiver	44.8	48.6
	PH and HCV-8: Eligibility Determination: Income Verification waiver	33.2	36.0
	PH and HCV-6: Family Self-Sufficiency (FSS) Contract of Participation: Contract Extension waiver	31.6	34.3
	PH and HCV-7: Waiting List: Opening and Closing; Public Notice waiver	25.4	27.5

Waiver Categories	Waiver Sub-categories	Overall Adoption Rate (among Public Housing Agencies [PHAs] that Adopted at least One Waiver) (%)	Adoption Rate within Waiver Categories (%)
	PH and HCV-9: Eligibility Determination: Social Security Number and Citizenship Verification waiver	23.2	25.1
Housing Quality Standards (HQS) Inspection Waivers	HQS-9: HQS Quality Control Inspections waiver	75.6	84.0
	HQS-1: Initial Inspection Requirements waiver	66.0	73.3
	HQS-5: HQS Inspection Requirement: Biennial Inspections waiver	60.4	67.0
	HQS-6: HQS Interim Inspections waiver	60.2	66.9
	HQS-3: Initial Inspection: Non-Life-Threatening Deficiencies (NLT) Option waiver	51.8	57.5
	HQS-4: HQS Initial Inspection Requirement: Alternative Inspection Option waiver	49.3	54.8
	HQS-10: Housing Quality Standards: Space and Security waiver	38.3	42.5
	HQS-2: Project-Based Voucher (PBV) Pre-Housing Assistance Payments (HAP) Contract Inspections: PHA Acceptance of Completed Units waiver	27.6	30.6
	HQS-7: PBV Turnover Unit Inspections waiver	25.6	28.5
	HQS-8: PBV HAP, Contract: HQS, and Inspections to Add or Substitute Units waiver	18.4	20.5

Waiver Categories	Waiver Sub-categories	Overall Adoption Rate (among Public Housing Agencies [PHAs] that Adopted at least One Waiver) (%)	Adoption Rate within Waiver Categories (%)
	HQS-11: Homeownership Option: Initial HQS Inspection waiver	16.8	18.7
Housing Choice Voucher (HCV) Waivers	HCV-2: Information When Family is Selected: PHA Oral Briefing waiver	67.1	78.4
	HCV-3: Term of Voucher: Extensions of Term waiver	66.5	77.6
	HCV-1: Administrative Plan waiver	55.2	64.4
	HCV-6: Automatic Termination of HAP Contract waiver	47.7	55.8
	HCV-5: Absence from Unit waiver	47.1	55.0
	HCV-4: PHA Approval of Assisted Tenancy: When HAP Contract is Executed waiver	44.4	51.9
	HCV-8: Utility Allowance Schedule: Required Review and Revision waiver	34.2	39.9
	HCV-7: Increase in Payment Standard During HAP Contract Term waiver	32.5	37.9
	HCV-14: Mandatory Removal of Unit from PBV HAP Contract waiver	14.1	16.4
	HCV-10: Family Unification Program (FUP): FUP Youth Age Eligibility to Enter HAP Contract waiver	13.7	16.0
	HCV-9: Homeownership Option: Homeownership Counseling waiver	11.4	13.3

Waiver Categories	Waiver Sub-categories	Overall Adoption Rate (among Public Housing Agencies [PHAs] that Adopted at least One Waiver) (%)	Adoption Rate within Waiver Categories (%)
	HCV-12: Family Unification Program (FUP): Timeframe for Referral waiver	10.6	12.4
	HCV-13: Homeownership: Maximum Term of Assistance waiver	10.4	12.1
	HCV-15: Project-Based Voucher (PBV) and Enhanced Voucher (EV) Provisions on Under-Occupied Units waiver	10.2	11.9
	HCV-11: Family Unification Program (FUP): Length of Assistance for Youth waiver	9.2	10.7
Public Housing (PH) Waivers	PH-12: Public Housing Agency Annual Self-Inspections waiver	41.2	56.3
	PH-4: Adoption of Tenant Selection Policies waiver	37.0	50.6
	PH-10: Tenant Notifications for Changes to Project Rules and Regulations waiver	36.4	49.8
	PH-1: Fiscal Closeout of Capital Grant Funds waiver	34.8	47.5
	PH-7: Over-Income Families waiver	33.5	45.8
	PH-6: Energy Audits waiver	29.4	40.1
	PH-9: Review and Revision of Utility Allowances waiver	28.7	39.2
	PH-8: Resident Council Elections waiver	24.5	33.5
	PH-13: Over-Income Limit: Termination Requirement waiver	22.4	30.6

Waiver Categories	Waiver Sub-categories	Overall Adoption Rate (among Public Housing Agencies [PHAs] that Adopted at least One Waiver) (%)	Adoption Rate within Waiver Categories (%)
	PH-14: Annual Choice of Rent waiver	20.2	27.6
	PH-3: Cost and Other Limitations: Types of Labor waiver	18.6	25.5
	PH-2: Total Development Costs waiver	13.4	18.3
	PH-11: Designated Housing Plan Renewals waiver	9.4	12.8
Public Housing Assessment System (PHAS), Section Eight Management Assessment Program (SEMAP), and Uniform Financial Reporting Standards Waivers	11c: Uniform Financial Reporting Standards: Filing of Financial Reports; Reporting Compliance Dates waiver	35.8	84.9
	12a: PHA Reporting Requirements on HUD Form 50058 waiver	35.0	82.9
Moderate Rehabilitation (MR) Program Waivers	MR-5: PHA Inspection Requirement: Annual Inspections waiver	6.9	91.9
	MR-0: Family Income and Composition: Annual Reexamination; Income Verification Requirements waiver	6.6	87.9
	MR-3: Family Income and Composition: Interim Reexaminations waiver	6.6	87.1
	MR-1: Family Income and Composition: Delayed Annual Reexamination waiver	5.8	76.6

Waiver Categories	Waiver Sub-categories	Overall Adoption Rate (among Public Housing Agencies [PHAs] that Adopted at least One Waiver) (%)	Adoption Rate within Waiver Categories (%)
	MR-4: Enterprise Income Verification (EIV) Monitoring waiver	5.7	75.8
	MR-6: Adjustment of Utility Allowance waiver	4.3	57.3
Mainstream (MS) Voucher Waivers	MS-3: Age Eligibility to Enter HAP Contract Statutory Authority waiver	7.8	69.6
	MS-1: Initial Lease Term waiver	7.6	67.9
	MS-2: Criminal Background Screening waiver	6.0	53.3

Exhibit D.2 | Waiver Adoption Rate by Moving To Work (MTW) Status

Waiver Categories	Waiver Sub-categories	Non-MTW Public Housing Agencies (PHAs) Adoption Rate (%)	MTW PHAs Adoption Rate (%)	MTW Expansion PHAs Adoption Rate (%)
Public Housing (PH) and Housing Choice Voucher (HCV) Program Waivers	PH and HCV-1: PHA 5-Year and Annual Plan Submission Dates: Significant Amendment Requirements waiver	45.6	25.6	18.8
	PH and HCV-2: Family Income and Composition: Delayed Annual Reexaminations waiver	44.8	59.0	43.8
	PH and HCV-3: Family Income and Composition: Annual Reexamination; Income Verification Requirements waiver	61.3	79.5	68.8
	PH and HCV-4: Family Income and Composition: Interim Reexaminations waiver	58.4	74.4	50.0
	PH and HCV-5: Enterprise Income Verification (EIV) Monitoring waiver	45.6	59.0	37.5
	PH and HCV-6: Family Self-Sufficiency (FSS) Contract of Participation: Contract Extension waive	31.1	53.8	31.3
	PH and HCV-7: Waiting List: Opening and Closing; Public Notice waiver	25.3	25.6	31.3
	PH and HCV-8: Eligibility Determination: Income Verification waiver	33.0	46.2	25.0
	PH and HCV-9: Eligibility Determination: Social Security Number and	22.5	51.3	18.8

Waiver Categories	Waiver Sub-categories	Non-MTW Public Housing Agencies (PHAs) Adoption Rate (%)	MTW PHAs Adoption Rate (%)	MTW Expansion PHAs Adoption Rate (%)
	Citizenship Verification waiver			
Housing Quality Standards (HQS) Inspection Waivers	HQS-1: Initial Inspection Requirements waiver	66.5	55.3	53.8
	HQS-2: Project-Based Voucher (PBV) Pre-Housing Assistance Payments (HAP) Contract Inspections: PHA Acceptance of Completed Units waiver	27.4	36.8	23.1
	HQS-3: Initial Inspection: Non-Life-Threatening Deficiencies (NLT) Option waiver	52.6	26.3	46.2
	HQS-4: HQS Initial Inspection Requirement: Alternative Inspection Option waiver	50.1	31.6	23.1
	HQS-5: HQS Inspection Requirement: Biennial Inspections waiver	60.0	76.3	53.8
	HQS-6: HQS Interim Inspections waiver	59.7	76.3	61.5
	HQS-7: PBV Turnover Unit Inspections waiver	25.1	42.1	30.8
	HQS-8: PBV HAP, Contract: HQS, and Inspections to Add or Substitute Units waiver	18.1	26.3	23.1
	HQS-9: HQS Quality Control Inspections waiver	75.4	81.6	76.9

Waiver Categories	Waiver Sub-categories	Non-MTW Public Housing Agencies (PHAs) Adoption Rate (%)	MTW PHAs Adoption Rate (%)	MTW Expansion PHAs Adoption Rate (%)
	HQS-10: Housing Quality Standards: Space and Security waiver	38.1	42.1	46.2
	HQS-11: Homeownership Option: Initial HQS Inspection waiver	16.5	23.7%	30.8%
Housing Choice Voucher (HCV) Waivers	HCV-1: Administrative Plan waiver	55.0	57.9	61.5
	HCV-2: Information When Family is Selected: PHA Oral Briefing waiver	66.6	84.2	69.2
	HCV-3: Term of Voucher: Extensions of Term waiver	66.1	76.3	69.2
	HCV-4: PHA Approval of Assisted Tenancy: When HAP Contract is Executed waiver	44.3	47.4	53.8
	HCV-5: Absence from Unit waiver	46.6	60.5	61.5
	HCV-6: Automatic Termination of HAP Contract waiver	47.7	47.4	53.8
	HCV-7: Increase in Payment Standard During HAP Contract Term waiver	32.2	36.8	46.2
	HCV-8: Utility Allowance Schedule: Required Review and Revision waiver	34.2	28.9	46.2
	HCV-9: Homeownership Option: Homeownership Counseling waiver	11.2	10.5	30.8

Waiver Categories	Waiver Sub-categories	Non-MTW Public Housing Agencies (PHAs) Adoption Rate (%)	MTW PHAs Adoption Rate (%)	MTW Expansion PHAs Adoption Rate (%)
	HCV-10: Family Unification Program (FUP): FUP Youth Age Eligibility to Enter HAP Contract waiver	12.7	39.5	38.5
	HCV-11: Family Unification Program (FUP): Length of Assistance for Youth waiver	8.6	23.7	23.1
	HCV-12: FUP: Timeframe for Referral waiver	10.0	26.3	23.1
	HCV-13: Homeownership: Maximum Term of Assistance waiver	9.9	23.7	23.1
	HCV-14: Mandatory Removal of Unit from PBV HAP Contract waiver	13.5	31.6	15.4
	HCV-15: PBV and Enhanced Voucher (EV) Provisions on Under-Occupied Units waiver	10.0	15.8	15.4
Public Housing (PH) Waivers	PH-1: Fiscal Closeout of Capital Grant Funds waiver	35.4	17.6	25.0
	PH-2: Total Development Costs waiver	13.7	5.9	8.3
	PH-3: Cost and Other Limitations: Types of Labor waiver	19.1	8.8	8.3
	PH-4: Adoption of Tenant Selection Policies waiver	36.8	47.1	33.3
	PH-5: Community Service and Self-Sufficiency Requirement (CSSR) Suspension waiver	29.9	17.6	16.7

Waiver Categories	Waiver Sub-categories	Non-MTW Public Housing Agencies (PHAs) Adoption Rate (%)	MTW PHAs Adoption Rate (%)	MTW Expansion PHAs Adoption Rate (%)
	PH-6: Energy Audits waiver	33.7	32.4	16.7
	PH-7: Over-Income Families waiver	24.4	29.4	16.7
	PH-8: Resident Council Elections waiver	28.8	23.5	33.3
	PH-9: Review and Revision of Utility Allowances waiver	36.6	29.4	41.7
	PH-10: Tenant Notifications for Changes to Project Rules and Regulations waiver	11.1	5.9	0.0
	PH-11: Designated Housing Plan Renewals waiver	41.3	44.1	25.0
	PH-12: Public Housing Agency Annual Self-Inspections waiver	22.5	20.6	16.7
	PH-13: Over-Income Limit: Termination Requirement waiver	20.6	5.9	25.0
	PH-14: Annual Choice of Rent waiver	35.4	17.6	25.0
Public Housing Assessment System (PHAS), Section Eight Management Assessment Program (SEMAP), and Uniform Financial Reporting	11c: Uniform Financial Reporting Standards: Filing of Financial Reports; Reporting Compliance Dates waiver	35.8	35.9	37.5
	12a: PHA Reporting Requirements on HUD Form 50058 waiver	34.8	43.6	31.3

Waiver Categories	Waiver Sub-categories	Non-MTW Public Housing Agencies (PHAs) Adoption Rate (%)	MTW PHAs Adoption Rate (%)	MTW Expansion PHAs Adoption Rate (%)
Standards Waivers				
Moderate Rehabilitation (MR) Program Waivers	MR-1: Family Income and Composition: Delayed Annual Reexamination waiver	5.3	23.1	6.3
	MR-0: Family Income and Composition: Annual Reexamination; Income Verification Requirements waiver	6.2	23.1	6.3
	MR-3: Family Income and Composition: Interim Reexaminations waiver	6.2	23.1	6.3
	MR-4: Enterprise Income Verification (EIV) Monitoring waiver	5.4	17.9	6.3
	MR-5: PHA Inspection Requirement: Annual Inspections waiver	6.7	17.9	6.3
	MR-6: Adjustment of Utility Allowance waiver	4.3	5.1	6.3
Mainstream (MS) Voucher Waivers	MS-1: Initial Lease Term waiver	7.4	15.4	12.5
	MS-2: Criminal Background Screening waiver	5.8	10.3	12.5
	MS-3: Age Eligibility to Enter HAP Contract Statutory Authority waiver	7.4	23.1	12.5

Appendix E. Results from the Exploratory Analysis of Administrative Data

In this section, researchers present the quantitative approach to examine the outcome of the Coronavirus Aid, Relief, and Economic Security (CARES) Act waivers on public housing agencies (PHA) operations. The researchers conducted an exploratory analysis of administrative data to measure the effect of the waivers on voucher utilization, budget utilization, and tenant accounts receivable (TAR) using a difference-in-differences (DID) approach. Data for this analysis were pulled from HUD's HCV Data Dashboard and the Financial Data Schedule (FDS).

The hypothesis for this analysis was that due to the suspension of PHAS scoring and the difficulties PHAs experienced with rent collection during eviction moratoria across the country, tenants may not have been paying rent. Consequently, the tenant accounts receivable for PHAs would have increased considerably, negatively impacting their financial and management performance.

Description of HUD's HCV Dashboard Data

Researchers collected data from a publicly available Housing Choice Voucher (HCV) dashboard on each PHA's monthly voucher and budget utilization, spanning from January 2015 to February 2024. 2M Research collected the monthly utilization data for 2,081 PHAs using web-scraping techniques. The researchers examined the data for missingness and excluded 208 PHAs from the sample with no information, reported zero values, or extremely large values (for example, the reported voucher utilization for NC001 in May 2020 was 433063 percent) on voucher and budget utilization from January 2018 to December 2024. The researchers then merged the cleaned utilization data with the CARES Act Waiver Reporting Tool (CAWRT) data. The final sample consisted of 1,676 PHAs.

HUD's Financial Data Schedule (FDS)

The data source of the TAR was HUD-provided FDS, which contains yearly data from 2018 to 2023. HUD provided data for all PHAs participating in the HCV program and those in the Public Housing (PH) program. However, a substantial portion of the PHAs participating in the HCV program did not have data on TAR. For instance, 85.5 percent of participants had missing TAR data in 2018. As a result, the researchers decided to limit the exploratory analysis to PHAs within the PH program, as this set of PHAs had less missing information. For example, only 10.1 percent of PHAs in the PH program were missing TAR data in 2018 compared with the PHAs in the HCV program.

Overall, the researchers extracted TAR data for 2,898 PHAs in the PH program. The researchers processed this data for missingness and excluded 695 PHAs with missing data or reported zero values. Next, the researchers merged this cleaned FDS data with the CAWRT data and successfully merged the information for 1,866 PHAs.

Quantitative Data Analysis Methodology

The researchers used a DID approach to examine the effect of the CARES Act waivers on voucher utilization, budget utilization, and TAR by comparing the average pre-post waiver implementation changes in outcomes of PHAs that adopted waivers to similar PHAs that did not adopt the waiver. The researchers used a propensity score matching (PSM) technique described in the next section to ensure that the characteristics of PHAs that adopted waivers were similar to those of PHAs that did not adopt waivers.

Propensity Score Matching

The objective of PSM is to match PHAs that adopted waivers to those that did not adopt waivers, such that the outcome trends of both groups of PHAs would have been the same in the absence of the waivers. This equivalence will ensure that any difference in outcome trends could potentially be attributable to the adoption of waivers.

The researchers used logistic regression to calculate the probability of each PHA adopting the waivers based on available characteristics such as MTW status, PHA size, program types, and geographic region. Next, the researchers calculated the predicted value of the probability of each PHA adopting the waiver. PHAs that adopted the waivers were matched to PHAs that did not adopt waivers, using these predicted values.⁸² Finally, the researchers examined if the characteristics used in the matching process were balanced and found little difference in characteristics between PHAs that did and did not adopt waivers.⁸³

Difference-in-Difference Analysis

After finding an appropriate comparison group, the researchers used a DID regression model to evaluate the effect of the waiver implementation on voucher utilization, budget utilization, and TAR (represented as Y in the following equation). To prepare the data for analysis, the researchers constructed the following variables—

1. A dummy variable 'post' to indicate the time after the waivers were released (2020 and 2021). This variable is set to zero for the years 2018 and 2019.
2. A dummy variable 'waiver adoption status' to indicate whether the PHA adopted waivers or not.

The estimation equation is:

$$Y = \beta_0 + \beta_1 [\text{Post}] + \beta_2 [\text{Waiver Adoption Status}] + \beta_3 [\text{Post} \times \text{Waiver Adoption Status}] + \varepsilon$$

⁸² The PSM was performed in R using the package MatchIt. Details on this R package are available at <https://cran.r-project.org/web/packages/MatchIt/MatchIt.pdf>.

⁸³ A balance test in propensity score matching assesses whether the matching process has effectively equated the treatment and comparison groups on observed covariates. It typically involves calculating standardized mean differences for covariates to ensure they are below a certain threshold (often 0.10) indicating good balance. The standardized mean differences for each covariate were below 0.05.

Quantitative Data Analysis Results

The researchers observed an increase in voucher and budget utilization for PHAs that adopted waivers (in alignment with the findings from PHA staff interviewed in the qualitative study). However, this increase is not statistically significant. The average **voucher utilization** for PHAs that adopted waivers in 2020 and 2021 increased by 0.51 percentage points, and average **budget utilization** increased by 0.26 percentage points (see **exhibits E.1 and E.2**).

Exhibit E.1 | Difference-in-Differences Estimation for Voucher Utilization

Term	Coefficient Estimate	p-value
Intercept (β_0)	98.92	0.00
Post Waiver (β_1)	-1.67	0.00
Waiver Adoption Status (β_2)	-0.06	0.81
Post * Waiver Adoption Status (β_3)	0.51	0.17

Notes: This exhibit provides the difference-in-difference (DID) estimation for voucher utilization. β_3 is the parameter estimate for the difference in the pre-post change in voucher utilization for PHAs that adopted waivers compared with PHAs that did not adopt waivers.

Exhibit E.2 | Difference-in-Differences (DID) Estimation for Budget Utilization

Term	Coefficient Estimate	p-value
Intercept (β_0)	82.25	0.00
Post Waiver (β_1)	-0.83	0.39
Waiver Adoption Status (β_2)	4.01	0.00
Post * Waiver Adoption Status (β_3)	0.26	0.81

Notes: This exhibit provides the DID estimation for budget utilization. β_3 is the parameter estimate for the difference in pre-post change in budget utilization for PHAs that adopted waivers compared with PHAs that did not adopt waivers.

Tenant Accounts Receivable (TAR)

The researchers transformed TAR by taking its logarithm to account for its skewed distribution. **Exhibit A.3** summarizes the DID regression results for TAR. The difference in pre-post change of TAR was an increase of 10.39 percent (exponential of the coefficient β_3). **This effect was not statistically significant.**

Exhibit E.3 | Difference-in-Differences (DID) Estimation for Tenant Accounts Receivable

Term	Coefficient Estimate	p-value
Intercept (β_0)	8.5936	0.00
Post Waiver (β_1)	0.3547	0.00
Waiver Adoption Status (β_2)	0.5433	0.00
Post * Waiver Adoption Status (β_3)	0.0989	0.521

Notes: This exhibit provides the DID estimation for TAR. β_3 is the parameter estimate for the difference in pre-post change in TAR (in logs) for PHAs that adopted waivers compared with PHAs that did not adopt waivers.

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