March 13, 2020

Ms. Marcie Chavez, Director
Los Angeles Office of Public Housing, Region IX
U.S. Department of Housing and Urban Development
300 N. Los Angeles Street, Suite #4054

RE: REQUEST FOR PROGRAM REGULATION/RULE WAIVERS DUE TO COVID-19 OUTBREAK IN ORDER TO MINIMIZE NEGATIVE HEALTH IMPACT TO OUR RESIDENTS AND PARTICIPANTS

Dear Ms. Chavez:

We have been monitoring the rapidly evolving situation surrounding the COVID-19 virus and its impending effect on the Santa Barbara community and communities closely tied to ours. We are now implementing measures to help mitigate the spread of the virus and assist in reducing community spread of the infection. Given the current crisis and the need to protect our staff, residents, and program participants, we are requesting, as has been requested by the Public Housing Directors Association (PHADA) to Secretary Carson, immediate waivers and regulatory relief. Specifically, we are requesting the following:

1. Suspension of HQS and UPCS required annual inspections and allow for any pending periodic inspections to be postponed indefinitely – until such time as the COVID-19 outbreak is deemed to be cleared.

   The HCV program serves low-income, disabled and senior residents - our community’s most vulnerable. This same population is also the most susceptible to contracting illnesses as a result of limited financial resources and medical care. Putting these clients in contact with an inspector who daily visits 30 – 50 housing units, occupied by 50 to 150 individuals (or more) will greatly increase the chance of infecting them and spreading the virus. This is very concerning to us.

2. Suspension of requirements for completing annual and interim recertifications/redeterminations within a specific time frame.

   Many tasks completed by staff members require face-to-face interaction, putting all parties at potential increased risk. The experts are advising that we take all necessary steps to create social distancing to reduce risks of the virus spread. Due to these issues, completing timely annuals and interim recertifications may be prohibitive.

4. Suspension of obligations and requirements relating to regular HUD submissions, including PIC, VMS and other electronic reporting requirements.

   While we will continue to attempt to submit timely reports, the disruption caused by the outbreak could delay submission of reports and we would like relief from the submission due date requirements.

5. Extend deadlines for any and all other submissions, including REAC unaudited financial filings competitive grant applications, grants, or other reports.

Out of an abundance of caution to protect the clients that we serve, we made the decision on Monday of this week to postpone all of HACSB’s public events through the end of May. We have also taken steps to inform our clients not to come to our office if they are symptomatic or have been in contact with persons who are ill with fever and cough. Additionally, we have asked staff to stay home if they are ill or have been in contact with persons who are ill. Finally, we are considering having clients mail in annual recertification packets and conducting phone interviews only.

We understand that our waiver requests would not be reasonable under normal circumstances, but we feel the need to do our part to protect our clients and staff during this unusual time of crisis.

Please advise as soon as possible so that we may take action immediately.

Sincerely,

HOUSING AUTHORITY OF THE
CITY OF SANTA BARBARA

ROB FREDERICKS
Executive Director/CEO

cc: Patricia Wheatley, Chair – Housing Authority Board of Commissioners
    Skip Szymanski, Deputy Executive Director/Chief Operating Officer
    Veronica Loza, Director of Housing Programs