



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D.C. 20410-3000

POLICY GUIDANCE NUMBER: 2020-01
DATE: June 26, 2020
SUBJECT: Pandemic-Related Income Verification Applicability Extension
STATUS: Current
APPLICABILITY: Lead Hazard Control Grant Programs, Healthy Homes Production Grant Programs
RELATED GUIDANCES: Income Verification Guidance 2017-05
COMMENTS: None

On March 13, 2020, President Donald Trump declared a national emergency as a result of a novel disease known as Coronavirus Disease 2019 (“COVID-19”).¹ The unprecedented COVID-19 pandemic has presented significant challenges for Office of Lead Hazard Control and Healthy Homes (OLHCHH) grantees and partners to continue to carry out their fundamental mission of protecting children and their families from health and safety hazards in the home. One major obstacle identified during the pandemic is the timely compliance with participant income verification certifications.

The OLHCHH’s lead hazard control grant programs² are authorized by section 1011 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, known as “Title X.”³ These grants are awarded through Notices of Funding Availability issued under that section. Section 1011(a) establishes family income eligibility requirements for the program. The OLHCHH’s healthy homes production grant programs⁴ are authorized by sections 501 and/or 502 of the Housing and Urban Development Act of 1970,⁵ or by Appropriations Acts.⁶

¹ Proclamation on Declaring a National Emergency Concerning the Novel Coronavirus Disease Outbreak (March 13, 2020). www.whitehouse.gov/presidential-actions/proclamation-declaring-national-emergency-concerning-novel-coronavirus-disease-covid-19-outbreak/.

² The lead hazard control grant programs include, but are not limited to, the following types of grants: Lead-Based Paint Hazard Control, Lead Hazard Reduction Demonstration, Lead-Based Paint Hazard Reduction, Lead-Based Paint Hazard Reduction (High Impact Neighborhoods category), and Lead-Based Paint Hazard Reduction (Highest Lead-Based Paint Abatement Needs category).

³ Title X is codified at title 42 U.S. Code chapters [63](#) and [63A](#); its section 1011 is codified at [42 U.S.C. § 4852](#).

⁴ The healthy homes production grant programs include, but are not limited to, the following types of grants: Healthy Homes Production Grant Program, Healthy Homes Production for Tribal Housing Grant Program, Healthy Homes and Weatherization Cooperation Demonstration Grant Program, and Older Adult Home Modification Grant Program.

⁵ The first three programs listed in footnote 4 are authorized by the HUD Act of 1970, sections 501 and 502, which are codified at [12 U.S.C. §§ 1701z-1](#) and [1701z-2](#), respectively.

⁶ The fourth program listed in footnote 4 is authorized by the Consolidated Appropriations Act, 2019 ([Public Law 116-6](#)), and the Further Consolidated Appropriations Act, 2020 ([Public Law 116-94](#)); future rounds of that program may be authorized by future appropriations acts or by the act cited in footnote 5.

According to the OLHCHH's Income Verification Policy Guidance 2017-05 for the lead hazard control grant programs,⁷ grantees are required to re-examine a household's income if the certification is more than six months old at the time of approval. However, because of COVID-19 stay-at-home restrictions and the closure and reduction in services of many public agencies and employers, OLHCHH is offering an income documentation **extension of an additional six months** for all program participant housing units that are currently under contract. For instance, if a Program Manager has approved income verification documents dated December 13, 2019, and has signed the program participants' unit under contract, the grantee does not have to recertify the participants' income until December 13, 2020, rather than the original June 13, 2020, six-month expiration date of the income verification. If unit work is not completed after December 13, 2020, the supporting documentation for income verification will no longer be considered valid and the grantee must gather new income information.

By granting this extension, the OLHCHH is helping grantees to be able to resume their lead hazard control programs and the work of contractors as safely and quickly as possible; nonetheless, the OLHCHH still encourages grantees to confirm with program participants through self-certification that their income has not significantly increased over the course of the pandemic.

Once pandemic restrictions are lifted in their local area sufficiently for most grantee business operations to be performed routinely, grantees are advised to follow Policy Guidance 2017-05 to ensure that required timing of income verification certifications are met.

If you want more information, please contact your grant's Government Technical Representative.⁸

⁷ www.hud.gov/sites/dfiles/HH/documents/PG_2017_05_Income_Verification_Guidance_Revision_Finalrv.pdf.

⁸ The contents of this document, except when based on statutory or regulatory authority or law, do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.