



Evaluation of PHA CARES Act Waivers

FINAL INTERVIEW PROTOCOL | CONTRACT #: 86614822F00045

Appendix D – Interview Protocol for Leadership and Operations Staff at PHAs that Declined to Adopt Waivers

Introduction

Interviewer: Thank you for agreeing to participate in this interview. My name is _____, and I am a researcher with 2M Research (2M), the policy research firm contracted by the U.S. Department of Housing and Urban Development (HUD) for this study.

I will start by briefly introducing the study, obtaining consent, and making sure we cover any questions you might have before we begin the interview.

The purpose of this study is to gather information about the background, authorization, and ways in which Public Housing Agencies (PHAs) have used CARES Act waivers to implement strategies to support residents and tenants during the COVID-19 pandemic.

As part of the study, we are interviewing stakeholders from 50 PHAs, including 45 PHAs that adopted waivers and five PHAs that declined to adopt any waivers, to understand their reasons for taking this course of action. For our conversation today, we would like to discuss why your PHA declined to use the waivers offered by the CARES Act, and any recommendations you may have for improvement, expansion, and sustainability of flexibilities offered by the waivers.

Our conversation should last approximately 60 minutes.

Permission to Record

Before we begin, we would also like to request your permission to record the conversation to ensure our notes are accurate and complete. We will not share the recording with HUD, and we will delete it at the end of the study.

Do we have your permission to record this interview?

If interviewee(s) agrees to be recorded:

Thank you. Now, I am going to start the recording (**TURN ON RECORDER**). Can you please confirm that you have agreed to be recorded?

If interviewee(s) declines:

Okay, that is not a problem. We will take detailed notes during this conversation to ensure that your views are captured accurately.

Consent to Participate

We hope you will be candid in the information you provide. We will aggregate information about your PHA and comments from stakeholders in our report. We will conduct all analyses using an anonymous (e.g., de-identified) data file and will not share your identity. You can refuse to answer any questions you do not want to answer. Your participation in this study is voluntary and you may stop at any time. There will be no negative consequences if you choose to stop or if you choose not to participate. We will only use your responses to this interview for research purposes and they will NOT be used for compliance monitoring. Would you still like to participate in the study?

Do you have any questions before we begin?

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 PHAs' 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 PHA attend any of these webinars?
4. What additional subsidies did your PHA receive during the pandemic (e.g., 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 PHAs' 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 PHAs’ 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?
- 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?
8. In your opinion, how could HUD improve the processes related to waivers offered to PHAs?

Section 4. Closing

9. 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?
10. Those are all the questions we have. Is there anything else you’d like to share that we have not asked about?

We would like to thank you for taking time from your busy schedule(s) to speak with us today. Your answers have provided us with valuable insight into how the waiver implementation process could be improved. Should you have any additional thoughts that you would like to share, please feel free to contact Dr. Hiren Nisar, the study’s principal investigator, at hnisar@2mresearch.com, or our HUD contact, Justin Brock, at Justin.Brock@hud.gov.
