

Coronavirus Relief Fund (CRF) Strategy 2 (SHIP) FAQ for Local Governments

General Questions

Q. What is the Coronavirus Relief fund?

A. The Coronavirus Aid, Relief, and Economic Security Act, also known as the CARES Act, is a \$2 trillion [economic stimulus](#) bill passed by the [116th U.S. Congress](#) and signed into law by President [Donald Trump](#) in March 2020 in response to the [economic fallout](#) of the [COVID-19 pandemic in the United States](#).

How much CRF funding is available through Florida Housing Finance Corporation?

Through the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), \$250 million from the Coronavirus Relief Fund (CRF) is available and will be allocated into the following areas:

- \$ 120 million to provide rental assistance for residents in Florida Housing funded developments;
- \$ 120 million to provide rent and mortgage assistance administered by the State Housing Initiatives Partnership (SHIP) jurisdictions; and
- \$ 2 million to provide operations support for special needs developments.

Q. How is the CRF funding related to the SHIP program?

A. The State of Florida has allocated \$120 million to be administered through the SHIP infrastructure. This funding, while not specifically SHIP, will carry some of the process and restrictions of the program for ease of administration.

Q. How much funding will each local government receive and when?

A. In the first round of allocations, FHFC is disbursing \$75 million in funds. The allocations for this round of funding are between \$175,000 (county minimum) and \$7.5 million (county maximum). Allocations will be based at the county level on reemployment data and then disbursed to eligible cities based on population figures. The remaining \$45 million is anticipated to be disbursed no later than October 15, 2020 and will be based on updated reemployment figures and local government performance in spending the first allocation.

Q. What do local governments need to do to receive the funds?

A. All local governments that are eligible for the SHIP program are eligible to receive CRF funds. Each local government will need to execute a subrecipient agreement with FHFC to receive the funds. This agreement will detail requirements of the funding as well as eligible activities. We expect that any city/county interlocal agreements will govern funds for those communities.

Q. How long do local governments have to spend the funds?

A. All funds must be expended no later than December 30, 2020. Any eligible activities that occur between March 1, 2020 and December 30, 2020 are CRF eligible.

Q. What happens to funds that are not expended by the deadline?

A. All funds that are not expended by December 30, 2020 will be returned to Florida Housing and in turn to the U.S. Treasury Department.

Q. Will local governments be required to follow the SHIP program requirements?

A. Some program requirements such as the maximum income set-aside (120%) and restrictions will be in place. Others, such as homeownership and construction set-asides will not be. There will be no requirement

to set-aside 30% of funds for very low- or low-income applicants, although we expect that in the current state of emergency you will be serving high percentages of these income levels.

Q. Will local governments be required to report on CRF expenditures?

A. Yes, FHFC will set up a reporting mechanism similar to the SHIP annual reporting portal for final reports which will be due by February 15, 2021. In addition, each local government is required to submit a monthly report of activities beginning with October 1, 2020.

Q. Will there be training on how to use the CRF funding?

A. Yes, FHFC will provide a series of webinars and direct technical assistance provided by the Florida Housing Coalition through the Catalyst program. The webinars will begin in July and will be helpful in understanding the requirements and best practices for spending the CRF funds.

Q. Will the CRF funds be subject to compliance monitoring?

A. Yes, the funds will be subject to regular SHIP-like compliance monitoring as any fiscal year funding would be with the CRF funds falling within the 2020-2021 fiscal year.

Q. Can a county and city that currently operate under an existing interlocal agreement continue to work under the agreement to administer CRF funds?

A. Yes, since the idea is to use the current SHIP infrastructure to maximize the ability to respond in a short time, interlocals may operate as they currently do. Funds will be sent in the same manner as with SHIP.

Uses of CRF

Q. What can the funds be used for?

A. The overarching requirement of all funding is that it must be spent on activities necessary due to the COVID-19 emergency. So, activities such as rental and mortgage assistance (and related counseling) payments or emergency repairs for persons who have experienced a hardship that prevents them from making these payments are clearly eligible uses. Beyond that, activities such as new construction may be eligible but would have to be related specifically to a need caused by the COVID-19 emergency and would need to be proposed to and approved by FHFC prior to implementation.

Q. With CRF, do the eligible activities have to match my LHAP? Do I need to amend the LHAP?

A. No, you do not have to update your LHAP since these CRF dollars are not SHIP funds. Instead, CRF is governed by the CRF Subrecipient Agreement which lists eligible activities. You do not need to submit any plans to FHFC before expending the funds.

Q. Does the 120% AMI requirement mean that the local government has to serve up to 120% AMI? Can the local government establish its own set-asides?

A. A local government is not required to serve up to 120% AMI. For example, a local government may decide to serve only lower income households (up to 80%) and establish its own set-asides as a local policy decision. The income requirements in the FHFC Subrecipient Agreement are the maximum allowed and the local government has discretion to determine its own set-asides based on local priorities.

Q. Are local governments required to fund all the activities listed in the funding agreement?

A. No, local governments can use any combination of the eligible activities listed in the FHFC Subrecipient Agreement. All activities not expressly listed in the funding agreement must be presented in writing to FHFC with sufficient justification and approved in writing by FHFC.

Q. When providing assistance to applicants experiencing homelessness, do local governments have to document a loss on income or a financial impact from COVID?

A. No, such applicants are eligible for COVID assistance even without showing an income reduction.

Q. The CRF rules state that funds must be spent by December. Does this mean that a new construction project must be completed by December?

A. CRF funds must be expended by December 30, 2020, and the FHFC Subrecipient Agreement defines "expended" to mean that "the affordable housing activity is complete." Also be advised that to use CRF funds for new construction, you will need to present that activity in writing to FHFC for approval.

Q. The Subrecipient Agreement contains the SHIP definition of eligible housing, which includes mobile homes construction after mid-1994. Does this mean we cannot assist those in older mobile homes?

A. FHFC will include a clarification in an upcoming amendment to the Subrecipient Agreement. You may assist those in older mobile homes with rent and mortgage payments, but not repairs.

Q. What are considered "utilities" for the purpose of providing utility payments to eligible applicants?

Can a City pay for an applicant's utility bills if the City owns and manages the utilities?

A. Utilities can include water, sewer, trash, electricity, gas, internet, phone, cable, or other similar services. A local government cannot use CRF funds to replace lost revenue directly, but a local government can provide assistance to an eligible applicant to pay utility bills to continue essential services.

Q. Can utility assistance be provided without paying rent?

A. A main goal of the program is to prevent eviction and keep Floridians stably housed. If only paying utilities will not protect the tenant or property owner from eviction, then assistance should not be provided. Otherwise, utility assistance can be granted provided that the applicant has a genuine COVID-related hardship that prevents them from paying their utilities to continue essential services.

Q. Can you provide more details on eligible CoC expenses for people experiencing homelessness?

A. The local government will provide information on how they intend to spend the money and who they will assist. A local government may provide rental assistance for persons experiencing homelessness to permanently house individuals as a way to mitigate the spread of COVID. Additionally, these funds could also be used for homelessness prevention, should the local government choose to provide these services.

Mortgage Payment Assistance

Q. Can CRF pay the property taxes escrowed in the monthly mortgage payment?

A. Yes it can. As a general matter, providing assistance to recipients to enable them to meet property tax requirements would not be an eligible use of funds, but exceptions may be made in the case of assistance designed to prevent foreclosures.

Q. The agreement provided states that CRF funds can be used for mortgage payments and buydowns. What is meant by "buydowns"?

A. A mortgage buydown refers to a borrower paying a fee in exchange for a lower interest rate on their mortgage.

Q. Can a local government provide mortgage assistance to an applicant with a local government mortgage?

A. Yes, as long as the applicant qualifies under program guidelines.

Q. For mortgage assistance, is there a requirement that the homeowner request a forbearance from their lender prior to being eligible under CRF funds?

A. It is not a requirement under FHFC guidelines, but a local government can enact such a standard if it deems necessary.

Q. Is housing counseling considered a project delivery cost?

A. No, housing counseling is not considered a project delivery cost and the amount of CRF spent on such counseling is not limited. Forbearance counseling and rent-related counseling can provide helpful information to eligible households. As a best practice, work with a HUD certified housing counseling agency, which may be paid a service delivery fee for providing counseling services.

Rental Assistance

Q. Do we look at the SHIP rent limits to confirm the affordability of an applicant's rent? Similarly, is there an affordability test for the amount of an applicant's mortgage payment?

A. Rent limits and mortgage affordability tests do not apply. While they are not a requirement, a local government could decide to take affordability into account when offering or prioritizing assistance.

Q. If there are two names on a lease and only one of them has lost their job, can we assist? Also, what about sub-leases? If there are two names on a lease (couple) that rent out an additional room, the additional member has lost his job but is not on lease? Is there help?

A. Yes, if one person in the household is unemployed or under employed, they may be eligible for assistance subject to other eligibility requirements. If the additional household member (renting the room) is part of the household, then yes, the household may qualify for assistance. However, if the additional household member (renting the room) has a lease for the room rental and loses his job, only he would be eligible for assistance with his rent for the room rental.

Q. Can assistance be given to an applicant that rents a room in a unit? Does that qualify?

A. Yes, as long as the person renting the room has a valid lease.

Q. Is there a maximum for how much can be spent on monthly mortgage or rent payments?

A. No, but the local government can establish award limit if they choose. This is a local decision.

Q. Can local governments assist with rent for persons living in motels?

A. Local governments should use CRF funds to assist those persons to move into a rental unit by paying move-in costs (e.g., security deposit) and providing rent payments through December 30, 2020, assuming the household meets other eligibility requirements.

Q. What documentation do we need to collect from Landlords?

A. Whatever your local government requires to issue payment to the landlord.

Q. Can we pay late fees and other additional fees from landlords?

A. Yes, these are eligible expenses.

Q. Can a local government pay rent for months outside of a lease term? For example, if an annual lease expires in October and the tenant is now technically operating on an at-will month to month unwritten lease, can a local government provide assistance?

A. That is up to the local government administering the CRF program as long as you are able to contact the landlord and confirm the existence of a tenancy.

Q. Does the landlord need to sign a rental eviction protection agreement with the local government?

A. There is no FHFC requirement to sign a rental eviction agreement. The local government may add this requirement if it chooses.

Q. Is a valid lease required?

A. Both the CARES Act and Treasury Guidelines are silent as to if a lease is required. All that is needed is the information necessary to determine that a tenancy exists, the assistance amount, and to whom to pay assistance (landlord/management company, for example).

Using CRF to Reimburse Eligible Expenses

Q. Can we use the funds to reimburse SHIP funds used to assist applicants affected by COVID-19?

A. Yes, provided that the activity funded is eligible under the CRF and CARES Act guidelines and that it was used for an activity that had not been previously budgeted for those SHIP funds. So, for instance, if you originally budgeted funds for DPA and had to redirect them to assist with rental assistance due to COVID-19, reimbursement would be eligible. The activity in question would have to have occurred from March 1, 2020 forward.

Q. When CRF dollars reimburse SHIP, what is the process for expending and reporting this SHIP funding?

A. This is tracked as program income received in the 20/21 state fiscal year, so these funds must be encumbered by 2022 and expended by June 30, 2023. Consider this 17/18 example related to reporting: If you use CRF to reimburse 17/18 SHIP funds, you will include them on the closeout 17/18 report as expended for rent or mortgage assistance. This records the first time when these SHIP funds were expended. They will next be reimbursed and must be expended again. This second time they are expended will be reported in the 20/21 report. In this way, the CRF reimbursement of SHIP is like any program income that comes from repayment of assistance.

Q. Can SHIP funds be reimbursed up until the CRF deadline in December 2020?

A. Funds that are already expended can be reimbursed. Funds that are encumbered with SHIP can be replaced by CRF funds for eligible activities. In this case, it is not a reimbursement, it is a reassignment of funding sources. The key difference is that funds which are reimbursed become program income in the FY 202-2021, while SHIP funds that are freed up due to CRF funds replacing them remain in the fiscal year in which they were allocated.

Q. We completed several rehabilitation projects in March. Can CRF reimburse for these costs if we document that a recipient has a COVID-related hardship?

A. No, if the rehabilitation work was regularly budgeted and planned for as housing assistance, CRF funds cannot reimburse those costs. If the project was already budgeted with SHIP, it was not provided because a

homeowner could not afford needed repairs due to a COVID hardship. Instead, the most likely reimbursable expenses are for rent and mortgage assistance granted due to a COVID hardship.

Q. Could a local government use CRF funds to reimburse CSBG, ESG, or other federal funds?

A. Reimbursements of funds other than SHIP might be eligible for CRF reimbursement. Email Robert Dearduff details of your case for consideration as CRF reimbursement.

Q. What if the household paid their rent from March through June but paid on a credit card? Can a local government reimburse them if they have the hardship and are income eligible?

A. Yes, this is similar to how homeowners might get reimbursed for temporary repairs they paid for immediately after a natural disaster. The local government can help an eligible applicant pay off credit card expenses for CRF-eligible activities. The local government would need to pay the credit card company directly.

[Applicant Eligibility & Administration of Funds](#)

Q. Who should sign the funding agreement with FHFC?

A. This is up to the local government to decide who is eligible to sign the agreement. We urge local governments to expedite the execution of the funding agreement. To ease administration of the second round of CRF funding, we encourage local governments to pre-approve any subsequent amounts to be received under this program.

Q. Is there a deadline for the agreement to be executed to get the first round of funding? If so, what if we are not able to execute the agreement by that deadline?

A. There is not really a deadline, but the local government cannot receive the funds until the agreement is executed and there will be no extension to the December 30 deadline to spend all funds. If you execute the funding agreement too late, you risk missing out on additional funds in the 2nd allocation to be announced by mid-October.

Q. Are local governments allowed to use funds for administration of the program?

A. Each local government may use up to 10% for administrative costs as well as a reasonable project delivery cost for services provided by third party individuals or organizations that perform a required task that local government staff cannot manage in the restricted timeframe without assistance. Keep in mind, that only 10% of the amount expended can be used for administration. So, for example, if you receive an allocation of \$1 million and only spend \$500,000 of it, your admin cap is \$50,000, not \$100,000.

Q. If the applicant has recently received SHIP COVID, CARES Act, or other types of assistance, are they able to apply for CRF assistance?

A. Yes, if they continue to have a COVID-related hardship, CRF could help them with their next months of rent or mortgage payments as long as there is no duplication of benefits.

Q. What steps should we put in place for CRF assistance related to avoiding duplication of benefits?

A. Use the self-certification form provided for CRF assistance. As a general standard, disaster assistance recipients sign such a form since there are often several possible sources of aid during disaster recovery. This notifies a recipient to confirm they will avoid scenarios where different resources pay for the same month of rent or other assistance.

Q. We created a Duplication of Benefits document for the SHIP disaster funds that we received for COVID-19. Can we use that same document for the CRF funds?

A. A similar Duplication of Benefits form can be used. Since the CRF program is not a SHIP program, you would want to change any text that references SHIP or a SHIP program – the revised form should specify that the assisted household is receiving assistance through the CRF program.

Q. We have some clients who are struggling to get the Duplicate Benefits agreement notarized due to COVID-19. What is the current work around if the client cannot get Duplicate Benefits Agreement Form notarized?

A. Instead of a notary, the applicant can get two witness signatures. Alternatively, the housing staff person may sign the document as a witness.

Q. Are we required to do an award letter and grant agreement?

A. You are not required. This is a local decision. Instead, every case of CRF assistance offered as a grant will be accompanied by the applicant signing the duplication of benefits form, which is a document that acknowledges the receipt of a CRF grant.

Q. Do we need a sub-plan for CRF funds to show the process being used?

A. You will want to create your own plan for using CRF funds but you do not need to submit that plan to FHFC. Although local governments do not need to submit a plan, local governments will need to provide a quarterly and monthly report due starting around September 30, 2020. Be sure to track your expenses but you do not need to submit a plan before expending your funds.

Q. We do not ask questions about citizenship status in our application, but when I was talking to an applicant, I got the sense that at least one person in the household does not have legal status in the country. Can I provide assistance to such an applicant?

A. Under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), undocumented immigrants can receive “short-term, non-cash, in-kind emergency disaster relief” regardless of legal status. Because CRF funds are short-term, provide a non-cash housing benefit to applicants (the applicants are not receiving the funds directly), are in-kind (not cash), and for emergency disaster relief, CRF funds can be used to assist persons without consideration of their legal status.

Q. Can CRF assistance only be provided during the period when a household is experiencing a COVID-related loss of income hardship? Even once a recipient is no longer unemployed or under employed, they may still be behind on many expenses and could use an additional month of assistance.

A. Applicants continue to experience hardships in the early days after income returns to pre-COVID levels. You may establish a local policy allowing for assistance to continue for one or more months after household income returns to pre-COVID levels. Similarly, an applicant who has recovered from a hardship could still receive assistance for past due rent or mortgage payments for the months when the applicant experienced a hardship. Such a policy resembles Florida Housing’s recent Hardest Hit Fund foreclosure prevention program which provided mortgage assistance to homeowners with hardships. Hardest Hit provided homeowners with two additional months of assistance after the end of their hardships.

Q. Can we pay for future months of rent and mortgage payments?

A. Yes, you may pay future months of rent and mortgage payments through December 2020. The CRF guidance regarding income eligibility is that rent and mortgage aid "should be structured in a manner to

ensure as much as possible, within the realm of what is administratively feasible, that such assistance is necessary." It seems reasonable to expect that most recipients have hardships that will continue through December. Even for recipients who recover from hardships, by December most will still be in the early months of recovery and requiring assistance.

Q. With regards to 120% income limit, if the household was above the 120% prior to 3/1/2020, but now are unemployed, would they be eligible for assistance?

A. Income eligibility and income calculation is based on current circumstances. If a household was above 120% AMI prior to the COVID-19 pandemic and lost income as a result of the crisis, they could be eligible for assistance.

Q. If the applicant lives in housing authority or subsidized apartments and already receives reduced rent but have been affected financially by COVID are they also eligible for these funds?

A. Generally, yes. But if an applicant lives in a FHFC-portfolio development that is receiving assistance through other FHFC CRF resources, they may not be eligible under this program. Projects that are assisted with federal and state funds should be working with their tenants and reducing rents to ensure affordability. Before assisting someone living in assisted housing, contact the management agent to confirm that they are working with the tenant to make the rents affordable. You do not want to duplicate benefits or pay rent when there are other sources of funds available to assist those specific tenants.

Q. Can a local government spend the funds in two phases? For example, can we help applicants catch up on past due rent and mortgage payments, and if we have funds remaining, later pay additional bills for the applicants already assistance?

A. Yes. Consider how to approach the second time providing assistance. The household receiving CRF assistance initially signed an income certification form that details eligibility. This document is considered valid and up to date for one year, so you do not collect any additional documentation from the household when you assist them a second time. Instead, email or call COVID assistance recipients to check their continued eligibility. If income has changed, you must obtain an updated self-certification and complete an updated income certification form. When you assist a household a second time, consider paying the rent or mortgage through the remainder of December if you anticipate the hardship could last until then.

Q. Must a household be delinquent to justify providing mortgage or rental assistance?

A. No, they do not have to be delinquent to receive assistance.

Q. Can all funds be disbursed as a grant? Is there a maximum dollar amount we can expend per client?

A. Yes, all the funds can be disbursed as a grant and there is no maximum award. These are local decisions.

Q. What federal requirements are attached to the funds?

A. Those requirements are listed at section L of the FHFC agreement.

Q. If doing emergency repairs, what is the maximum home value? Is it the same as regular SHIP?

A. There are no value limits tied to these funds. A local government can establish limits if they choose.

Q. When someone is deemed eligible, who does the local government write the check to? Applicant? Landlord/Management Company?

A. We recommend that the check should be paid to the landlord, management company or mortgage company.

Q. Does this funding have a CFDA number or a Florida CSFA number?

A. The number is included on page 4 of the agreement. It is 21.019.

Q. Do insurance requirements in your regular SHIP program transfer over to CRF funds?

A. No.

Q. If the local government contracts with a sub-grantee to administer the funds, who is responsible if the sub-grantee misses a step or a rule?

A. The local government that executed the agreement with FHFC is ultimately responsible for the actions of a sub-grantee.

Q. How do we protect against fraud? What is the local government's liability related to fraud?

A. Fraud is certainly a risk. As part of the application process, applicants are required to sign a statement attesting to the fact that falsifying information for the purpose of receiving assistance is a first-degree misdemeanor. Protect against fraud by exercising due diligence. This means that the local government ensures that the applicant attests under penalty of law that their information is correct, the local government reviews the information thoroughly to assess eligibility, and the local government affirms hardship and income eligibility. If an applicant is found to have lied on the application, the local government can exercise due diligence by bringing legal action against the applicant to recoup funds.

Advertising Requirements

Q. What are the advertisement requirements?

A. FHFC is issuing technical guidance to allow for alternate methods of advertising in the emergency situation.

Q. Do we have to wait 10 days after the advertisement to take new applications?

A. You can assist applicants who have already applied for COVID related assistance eligible under CRF but will need to advertise for new applicants.

Q. If you have more applicants in the cue than funding, do you have to advertise?

A. That is a local decision. Keep proof of how you advertised for the current applicants.

Q. Can we advertise prior to getting the contract signed?

A. Yes.

Documentation of Eligibility

Q. How will applicants be processed and income qualified?

A. Each local government will follow their local application process, but under the emergency situation may use expedited methods of processing applications and reviewing and qualifying income.

Q. At a minimum, what should the applicant's file contain?

A. The Funding Agreement states the documentation that each local government must retain if applicable:

- Income compliance and proof of eligibility: Collect the self-certification of income and the CRF application, which includes a section where the applicant lists sources of income and describes

income loss because of a COVID-related hardship. Fill out an income certification form based on information from these documents.

- Document Homeownership: Collect one of these items - Warranty Deed, Homestead Exemption, Quit-Claim Deed, Tax Records, Long-term Lease, Life Estate
- Household: Identification documents for all household members, including driver license, birth certificate, utility bill, voter's registration, school record of permanent residence,
- Use of FEMA proceeds: Although the Subrecipient Agreement mentions FEMA funds, there are no such funds involved with this COVID assistance. Instead, this topic relates to other sources that could also aid an applicant. Each applicant must sign the Duplication of Benefits form created specifically for this CRF assistance.
- Inspections: emergency repair work should include relevant documents like a mold remediation or wood destroying organisms report as well as a certificate of occupancy as necessary.
- Payments: Contact information for the landlord, mortgage company and /or utility company, which might include a lease, monthly mortgage statement, or utility bill. Copies of checks for CRF assistance provided

Q. As a local government that has CRF funds from other sources, we established a process where we are verifying income by requesting the most recent paystub. Is that acceptable for FHFC's CRF funds or must we use the self-certification form?

A. You can use any method you choose. You are not required to use the self-certification method. This is an option.

Q. Is a statement from the impacted person stating they were impacted by COVID a sufficient documentation for use of CRF?

A. Once the applicant signs the self-certification of hardship, you do not need to collect any additional hardship-related documents. This self-certification is not the only item in a CRF file that documents the hardship, however. The application contains a section where the applicant writes about pre-COVID income, income reductions, and details of the hardship. You must scrutinize this explanation of the hardship to confirm the applicant is eligible.

Q. Is the form "CRF Self-Certification of Income and Hardship" all that is needed in a CRF file to document household income?

A. You do not need to collect third-party verification of income and assets like you do for a SHIP case. The self-certification of income replaces that, but it is not the only item in a CRF file that documents income. Also see the application where you can review what the applicant writes about income sources and household members with a COVID-related hardship. Finally, use the income information from self-certification and the application to fill out an income certification form to be signed by you and the applicant. You may choose to collect additional information, but you are allowed to use self-certification under this program.

Q. If a local government uses the Self-Certification form for applicants, will it be required to follow up with usual SHIP income certification documentation later when audited?

A. No, there is no follow up required. You may choose to follow up as a local policy, but it is not required. You also do not need any back-up documentation for self-certification.

Q. What are some examples of an applicant who has been affected by COVID?

A. Applicants that have been unemployed, furloughed, or otherwise have experienced a reduction in income due to the economic effects of COVID-19 will be eligible. Persons who were unemployed prior to the COVID-19 pandemic can also be eligible if they attest to the fact that COVID-19 has negatively affected their job prospects. Persons experiencing homelessness can be eligible as a way to reduce the spread of COVID-19, especially if the homeless applicant currently lives in a crowded, congregate setting or outside. No proof of loss of income is required to justify spending CRF funds on homeless-related assistance.

Q. How would you verify a COVID hardship for emergency repairs?

A. The applicant would need to verify their loss of income/employment and provide evidence that repairs are needed. FHFC is leaving that mostly up to local governments to determine.

Q. If the federal unemployment benefits (\$600 weekly) are extended by Congress, will we need to include that in the Self Certification of Income and calculate in annual income?

A. Pursuant to HUD guidelines, the federal unemployment benefits under the CARES Act are classified as stimulus funds, not unemployment benefits. These funds are specifically excluded from the income calculation.

Q. Is a digital signature acceptable or must we secure a "wet" signature?

A. Digital is acceptable.

Q. Are local governments required to count assets as part of determining income?

A. The applicant will list their assets on the application and self-certification and this information will be added to the RIC form.

Q. Do local governments need a monthly certification to confirm continued hardship each month assistance is provided? If paying for retroactive rent/mortgage payments, does the applicant need to provide a certification for each month that they are requesting assistance?

A. No, you do not need to do monthly updates. You can pay several months of assistance in a lump sum, not to exceed 10 months.