



Questions and Answers for Impact of COVID-19 on Housing and Homelessness Webinar 3/19/20

All answers have been approved by Florida Housing Finance Corporation and the Florida Housing Coalition.

Last Updated on 03/24/2020 at 11:00am.

State Housing Initiatives Partnership (SHIP)

Q1: We currently have a disaster strategy, but it is specific to physical damage. It states that rental assistance can be provided to those displaced due to damage from the storm. Changing this wording to allow for rental assistance to those impacted by COVID-19 would be a technical revision only, correct? This will require that we make the proposed changes and send to you for review, correct?

A: Yes, submit a request for approval of a technical revision to FHFC in strikethrough underline format to Robert.Dearduff@floridahousing.org.

Q2: Is there guidance on what we can use to show tie-back to the disaster in this case? To operate under the disaster strategy, how will we show that the applicant was in fact impacted and what documentation would be required to stay compliant?

A: Proof of hardship can be loss of employment or lay off. What documentation is used can be basic proof that they are out of work temporarily or long term. It can be a letter or e-mail from the employer.

Q3: During the webinar on March 19, 2020, Robert Dearduff mentioned that the homeownership and construction set-asides can both be waived for the program years that we have unexpended funds toward this disaster. Is this a given (waived for all), or something that we'll need to request specifically and have reviewed for approval? We want to make sure prior to diverting funds from homeowner/construction projects to rental assistance.

A: Each local government that desires a waiver must submit a request for waiver to FHFC. The request for waiver can be emailed to Robert.Dearduff@floridahousing.org. The local government will submit a written request providing details of the activities, fiscal years and unencumbered dollars affected by the waiver. Include the specific set-asides that the local government wants waived (for example 75% construction set aside), the specific strategy and activities, and the unencumbered dollar amount for each SHIP fiscal year anticipated to be used under the waiver. When a request for waiver of the 65% homeownership set aside is approved, it automatically allows the local government to exceed the 25% cap on rental assistance. Here is a sample waiver request format (*ON NEXT PAGE*):

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Q3 Continued

WAIVER REQUEST TEMPLATE

The City/County requests a SHIP waiver of the homeownership and construction set-asides and the 25% restriction on rental assistance for the _____ SHIP Allocation(s) in order to provide COVID-19 assistance of the following types:

Temporary Rent Payments

Eviction Prevention

Foreclosure Prevention/Mortgage Assistance

Foreclosure Counseling

The status of 17/18 close-out year funds is: ____ expended ____ encumbered ____ unencumbered

The status of 18/19 Allocation: ____ expended ____ encumbered ____ unencumbered
Current Set-Aside Compliance is approximately ____ % for the Homeownership Set-aside, and ____ % for the Construction Set-aside

The status of 19/20 Allocation: ____ expended ____ encumbered ____ unencumbered
Current Set-Aside Compliance is approximately ____ % for the Homeownership Set-aside, and ____ % for the Construction Set-aside

Q4: Is there any talk of extending the 6/30/2020 expenditure deadline for SHIP? I anticipate experiencing issues with clients not allowing contractors into their homes and contractors not wanting to enter client homes. COVID-19 has the potential to halt our Rehab program completely.

A: A local government that anticipates it will fail to comply with the expenditure deadline for its 17-18 SHIP funds should submit a request for extension to Robert Dearduff, the SHIP administrator at Robert.Dearduff@floridahousing.org. There are no encumbrance extensions.

Q5: Are offices continuing to offer services to customers as usual during this crisis or have alternate service measures been implemented, and if so, what are those alternatives?

A: Each office and local government will be enforcing different measures. Contact the organization or visit the website to get the most current information.

Q6: I have been able to obtain the income and asset verification forms to determine the eligibility of current SHIP applicants. However, I am not meeting with applicants right now so they cannot sign the income certification form to complete the eligibility determination process. Can I sign the form for right now, mail an award letter if they are eligible, and make a note that the adult members of the applicant household will sign the form once social distancing policies are relaxed?

A: Yes, it is acceptable during this social distancing period for you alone to sign the income certification form (also called the Residential Income Certification (RIC)). This is an acceptable practice that is similar to how HUD is currently allowing rental property managers to delay collecting



resident signatures for income re-certification. Here is the specific guidance that Florida Housing Finance Corporation's staff has provided on this topic:

The HUD 4350.3 Occupancy Handbook contains guidance regarding extenuating circumstances that cause delay in the execution of its consent forms and HUD 50059 tenant certification and until the IRS issues guidance to the contrary, Florida Housing will emulate HUD and apply the extenuating circumstances principals and postpone execution of all verification and certification documents. The owner must document the reasons for the delay in the resident file ("Applicant/resident did not sign due to COVID-19 risk.") and indicate how and when the tenant will provide the proper signature.

Q7: With many of the customers we serve being elderly or disabled, should we proactively be suspending contractual rehabilitation?

A: Each local government will seek alternative ways of providing assistance under this disaster. Follow the recommendations of your local government officials on how to conduct business moving forward.

Q8: Our County Offices are shutting down to the public and the suggestion is to switch to virtual meetings and signings. Is this possible to do with SHIP or does this mean we need to stop all operations until we are able to sign all documents in person again?

A: During this disaster, the local government can request approval of a waiver to resort to other methods for the signing of contracts and agreement to continue to provide services. Request a waiver from FHFC on an alternative method that will be used to provide assistance.

Q9: What if you do not have rental assistance or foreclosure prevention in your current LHAP? Can we still assist our community?

A: If your disaster strategy under the SHIP program currently does not provide rental or foreclosure assistance you should make a technical revision to the LHAP in underline and strikethrough format and submit the request for approval to Robert.dearduff@flhousing.org. Consider adding disaster strategy activities like "Temporary rent payments for up to 12 months for tenants financially impacted by COVID-19" and "Temporary mortgage payments for up to 12 months for homeowners financially impacted by COVID-19".

Q10: What do you do if you currently do not have rental subsidies in your LHAP? Would we be able to revise our LHAP to allow for these options?

A: Yes, you can. However, see the previous question and answer. You may be planning to offer 'temporary rent payments' through your disaster strategy. This is different than offering 'rent subsidies', an activity that is reserved only for very low-income households that are homeless or special needs which requires a separate LHAP strategy and should not be included in your disaster strategy. By contrast, first and last month's rent, security and utility deposits payments and foreclosure prevention can be provided to all eligible income groups.



Q11: Under the SHIP disaster strategy, can funds be provided as a 'service delivery fee' to agencies that offer short term rental assistance? This would help them cover their operating/admin expenses.

A: The SHIP program allows for payment of a service delivery fee for subrecipients that administer a SHIP strategy on behalf of the local government. Sponsors can be paid reasonable project delivery fees for carry out all or a portion of a strategy. The amount that will be provided as administrative expenses or project delivery shall be included in the LHAP.

Q12: Can local governments contract with counseling agencies to provide foreclosure prevention or eviction prevention counseling services?

A: Yes, funding to counseling agencies is an eligible SHIP administrative expense. It is a best practice to partner with a HUD approved housing counseling agency. A list of agencies is at <https://www.hud.gov/states/florida/homeownership/hsgcounseling>.

Q13: If we have some unencumbered SHIP funds that we can now use for Foreclosure Assistance and/or Rental Assistance for this disaster, must we advertise these funds? When we advertised for our 2019/2020 funds, we did not break it down by strategy. If we must advertise, would we have to comply with the 30-day rule?

A: You can request a waiver of the SHIP advertising requirements that require you to advertise in a newspaper of general circulation and the 30 day wait period required for accepting applications. Please submit the waiver request to Robert.Dearduff@floridahousing.org.

Q14: Our City is exploring the idea of providing bed/bathing stations, etc. for the homeless population. Please let us know if we could use the disaster strategy to address the items listed above.

A: No. SHIP is a housing program and requires that an eligible person occupy eligible housing. This activity is more geared to the use of CDBG or ESG funds.

Q15: Our County has declared a local Emergency due to the COVID-19 situation. I've been asked to email you to see if Florida Housing Finance Corporation has mentioned anything about allowing extensions of the June 30th SHIP expenditure deadline. I realize we are only one of many that this will be affecting, however this will be freezing all of our grant programs for at least 2 or more weeks. The main reason I am reaching out to you at this time is because our inspector has been pulled out of the field effective immediately until further notice. Unfortunately, this will be stopping all SHIP grant activity for new and current projects.

A: Florida Housing Finance Corporation will provide extensions on a case by case basis to statutory requirements. Request for extensions should be submitted to Robert.Dearduff@floridahousing.org. The request should include the fiscal years affected, the amount of funds affected by fiscal year, and the proposed date the local government will meet the expenditure deadline.



Q16: Can I use my disaster strategy for unencumbered funds?

A: Yes, you can now use your Disaster strategy for unencumbered SHIP funds since the Governor has issued an executive order related to COVID-19 response.

Q17: I have a new Local Housing Assistance Plan (LHAP) due May 2. The commission meetings have been canceled as well as the AHAC meetings. Is it possible to get an extension on the submission deadline?

A: There is no extension available for this statutorily mandated deadline. If your LHAP was submitted to FHFC for a conditional review, that submission met the May 2 submission deadline requirement. If not, your LHAP is simply late until it is received. The only effect is that FY 20-21 funds cannot be disbursed until the LHAP is approved and is likely that the first 20-21 disbursements will be available in September or October.

Homelessness

Q1: During the COVID-19 webinar on March 19, 2020 Amanda Rosado referenced King County. In what state is King County?

A: King County is in the State of Washington.

Q2: How do homeless shelters and bridge programs intend to keep staff from contracting COVID-19? It seems that washing our hands and practicing social distancing is not practical, as many staff cannot work from home. We don't not have adequate garments.

A: There is guidance for emergency shelters from HUD at their website:

<https://www.hudexchange.info/resource/5985/infectious-disease-toolkit-for-cocs/>

Access to supplies is a hardship many providers are facing. It is important to work with your local Health Department to get prioritized for supplies. The CDC continues to urge shelters to wipe off surfaces as that is one of the key ways of spreading. Do not leave it up to shelter guests to clean areas.

It is important to share information about emergency shelters and needs related to those staying in these shelters (and in unsheltered encampments) with the local Health Department. Discussing these needs will help facilitate the direction of resources and personnel to be appropriately dedicated to this need.

Q3: Are Continuum's of Care eligible for reimbursement?

A: If the CoC enters into a written agreement with a local government to provide services associated with COVID-19, the agreement should state that it will reimburse expenses as of a specific date for the services covered under the written agreement.

Regarding federal funding, HUD has provided guidance related to Emergency Solutions Grant, Community Development Block Grant, and Continuum of Care Program funding. See the links below for guidance.



- [Using a Disaster Policy to Fund Infectious Disease Preparedness and Response with ESG](#) (HUD - March 18, 2020)
- [Using CoC Program Funds for Infectious Disease Preparedness and Response](#) (HUD - March 13, 2020)
- [Eligible ESG Costs for Infectious Disease Preparedness](#) (HUD - March 5, 2020)

Q4: Would Florida Housing be in a position to encourage Department of Health to provided added attention to the needs of those experiencing homelessness, in particular those in Emergency Shelter/unsheltered who may need to be isolated/quarantined?

A: The Florida Housing Coalition and the Florida Housing Finance Corporation are working with advocacy groups, the Department of Emergency Management, the National Low Income Coalition and other organizations that are affordable housing advocates to provide recommendations that will provide support and protection to our most vulnerable populations including people experiencing homelessness.

Q5: How do you suggest homeless providers go about conducting quarantine as hospitals discharge noncritical COVID 19 clients? We are closed to new intakes, so we are taking care of only our existing clients.

A: Please see the link to HUD's infectious disease toolkit for preventing and managing the spread of infectious disease within shelters: <https://files.hudexchange.info/resources/documents/Infectious-Disease-Toolkit-for-CoCs-Preventing-and-Managing-the-Spread-of-Infectious-Disease-within-Shelters.pdf>

The toolkit includes many examples of shelter policies. Many shelters are working with their local government to identify hotels and other spaces to help with isolation and quarantine. Shelters need to work with their local Health Department and healthcare providers to come up with a specific policy for handling this.

Q6: Are we to quarantine COVID-19 positive (confirmed) in the same unit or separated from each other in a shelter setting?

A: The CDC recommends the following for congregate shelters:

Confine clients with mild respiratory [symptoms](#) consistent with COVID-19 infection to individual rooms, if possible, and have them avoid common areas.

- Follow CDC [recommendations](#) for how to prevent further spread in your facility.
- If individual rooms for sick clients are not available, consider using a large, well-ventilated room.
- In areas where clients with respiratory illness are staying, keep beds at least 6 feet apart, use temporary barriers between beds (such as curtains), and request that all clients sleep head-to-toe.



- If possible, designate a separate bathroom for sick clients with COVID-19 symptoms.
- Consider reducing cleaning frequency in bedrooms and bathrooms dedicated to ill persons to **as-needed** cleaning (e.g., of soiled items and surfaces) to avoid unnecessary contact with the ill persons.

See this link for the full list of CDC recommendations for shelters:

<https://www.cdc.gov/coronavirus/2019-ncov/community/homeless-shelters/plan-prepare-respond.html>

Emergency shelters should also consult with their local Health Department to implement policies and procedures regarding isolation and quarantine.

Other Questions

Q1: Some counties have halted eviction proceedings, such as Miami Dade Sheriff refusing to serve writs. Is there any update or legislative efforts to cease eviction proceedings in other counties in Florida?

A: The Florida Housing Coalition will continue to advocate for our most vulnerable populations. FHC will provide updates on our website and weekly COVID-19 updates that will be held every Thursday at 1:30 pm.

Q2: My City Manager cancelled all training related travel. I had paid to attend the FHC Conference. Who do I contact to let them know?

A: The FHC affordable housing conference is five months away. It is hoped that this crisis will be over in August. We encourage you to wait until the date gets closer to cancel your registration. If you are required to cancel your registration, please email wells@flhousing.org.

Q3: Can you provide me with the recording and slides for the COVID-19 webinar from yesterday?

A: Here is the link for the recording and webinar slides: <https://www.flhousing.org/covid-19-housing-related-resources/>