



# FLORIDA HOUSING COALITION

## COVID-19 Housing and Homelessness Frequently Asked Questions

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

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## State Housing Initiatives Partnership (SHIP)

### INCOME ELIGIBILITY

**Q1:** How do we complete the income certification process for a recently laid off applicant impacted by COVID-19? It is difficult to estimate income in the next 12 months for many applicants who do not know if they are experiencing a temporary lapse of employment income or are fully unemployed.

**A:** Applicants do not know when or if they will be re-hired. This is a case like those included in the HUD Handbook 4350.3 where you must estimate 12 months of income based on the household's current circumstances. Count and annualize all remaining sources of household income.

### PREPARING FOR COVID-19 EMERGENCY ASSISTANCE

**Q2: What if you do not have rental assistance or foreclosure prevention in your current LHAP? Does a community have to update its LHAP in order to provide COVID-19 emergency assistance?**

**A:** Yes, you must make a technical revision to the Disaster Strategy in your LHAP to offer COVID-19 Support. Even if you already had a rental assistance or foreclosure prevention strategy, you would also likely make some technical revisions to it.

Most will make a technical revision to a disaster strategy. Email them in underline and strikethrough format to [Robert.dearduff@flhousing.org](mailto:Robert.dearduff@flhousing.org). Replace the 'Summary of the Strategy' from your current disaster strategy with the following:

- a. Summary of the Strategy: The Disaster Assistance strategy provides funds to households following a disaster or emergency declared by the President of the United States or Governor of the State of Florida. SHIP disaster funds may be used for items such as, but not limited to:
  - (a) purchase of emergency supplies for eligible households to weatherproof damaged homes;
  - (b) interim repairs to avoid further damage; tree and debris removal required to make the individual housing unit habitable;
  - (c) construction of wells or repair of existing wells where public water is not available;
  - (d) payment of insurance deductibles for rehabilitation of homes covered under homeowners' insurance policies;
  - (e) security deposit for eligible recipients that have been displaced from their homes due to disaster;
  - (f) rental and utility assistance for eligible applicants.
  - (g) mortgage and utility payment assistance for eligible applicants.
  - (g) Strategies included in the approved LHAP that benefit applicants directly affected under the Executive Order.
  - (h) other eligible activities as proposed to and approved by Florida Housing.



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In less common cases, you will make revisions to a Rental or Foreclosure Prevention Strategy.

For a Rental Assistance or Eviction Prevention Strategy add this to the summary:

“Temporary rent and utility payments for up to 12 months for tenants financially impacted by a disaster”

For a Foreclosure Prevention Strategy add this to the summary:

“Temporary mortgage and utility payments for up to 12 months for homeowners financially impacted by a disaster”

To be most efficient, use the “Technical Revision & Waiver Requests TEMPLATE” which provides the needed text and guidance (available on the FHC COVID website or by emailing [chaney@flhousing.org](mailto:chaney@flhousing.org)).

One type of COVID-19 emergency assistance is foreclosure counseling. No LHAP changes are needed to immediately spend SHIP funds on foreclosure counseling. Another question addresses how it is best to contract with a HUD approved counseling agency for this. Foreclosure counseling is allowed on page 4 of all LHAPs under the section K. Support Services and Counseling, which includes the standard language “Available support services may include but are not limited to: Homeownership Counseling (Pre and Post), Credit Counseling, Tenant Counseling, **Foreclosure Counseling** and Transportation.”

**Q3: On the first COVID-19 webinar on March 19, 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 waived for all or something that we need to request? We want to make sure prior to diverting funds from homeowner/construction projects to rental assistance.**

A: The waiver will be provided at the same time the FHFC approves the technical revision to the SHIP strategy. The FHFC intends to make this process as easy as possible. To be most efficient, use the “Technical Revision & Waiver Requests TEMPLATE” that Florida Housing Coalition staff created to supply the needed text and guidance (available on the FHC COVID website and by emailing [chaney@flhousing.org](mailto:chaney@flhousing.org)).

As noted on the Template, your waiver request should provide details of the activities, fiscal years and unencumbered dollars involved in 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.

**Q4: If we have some unencumbered SHIP funds that we can now use for COVID-19 Foreclosure Assistance and/or Rental Assistance, must we advertise these funds? Would we have to comply with the 30-day rule?**

A: Again, the waiver for the advertisement requirements will be provided by the FHFC at the same time your technical revision is approved. Any SHIP local government that wants to provide COVID-19 assistance simply completes a LHAP technical revision to the SHIP disaster strategy. The advertisement waiver is granted at the same time as approval of the technical revision. To be most efficient, use the “Technical Revision & Waiver Requests TEMPLATE” that Florida Housing Coalition staff created to supply the needed text and guidance (available on the FHC COVID website or by emailing [chaney@flhousing.org](mailto:chaney@flhousing.org)).



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**Q5: Will waivers apply to all program years or a specific program year(s)?**

A. When the local government submits a request for a waiver, they need to specify the SHIP program years.

**Q6: Is the special needs set aside requirement still in place for this crisis?**

A. Yes.

**Q7: Regarding SHIP for Temporary Rent Payments: Assuming a Local Government decides to do this, how quickly could this happen?**

A: See the answer above about making technical revisions to a SHIP Strategy, which is the first action to take. The revision does not have to be approved by your city or county commission. Once Robert Dearduff reviews and approves the revision, he will waive SHIP advertisement requirements and you may start announcing assistance, completing other outreach, and accepting applications.

**Q8: What if we currently do not have Rental Subsidies in our LHAP? Would we be able to revise our LHAP to allow for these options?**

A: See the previous questions and answers about technical revisions and waivers. It is likely that you are 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, 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, rent and utility payments and eviction prevention can be provided to all eligible income groups by completing a technical revision to your disaster strategy.

## AVAILABLE FUNDING AND DEADLINES

**Q9: 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: First, consider re-assigning delayed projects to your 20/21 SHIP allocation. Any freed up unencumbered funds could be shifted to COVID-19 emergency rent, mortgage and utility payments. Any local government that cannot use COVID assistance to resolve 17/18 expenditure deadline concerns should submit a request for extension to Robert Dearduff, the SHIP administrator at [Robert.Dearduff@floridahousing.org](mailto:Robert.Dearduff@floridahousing.org). There are no encumbrance extensions. To be most efficient, use the “Technical Revision & Waiver Requests TEMPLATE” which includes the needed text and guidance about an extension (available on the FHC COVID website and by emailing [chaney@flhousing.org](mailto:chaney@flhousing.org)).

**Q10: Will the waivers also apply to our 20-21 SHIP funds received after July 1 or will we need to request additional waivers?**

A. You can include 20-21 as part of the waiver request now if you anticipate you may use those SHIP funds, but you will need to spend the oldest distribution first. Keep in mind, the waivers only apply if funds that are used to assist applicants under the current Executive Order cause the shortfall on a set-aside requirement. The waiver is not a blanket waiver that allows a local government to ignore the set-



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asides if funds are used for regular SHIP activities. Additionally, the 20-21 funds likely will not be available until October, so it is unlikely Florida Housing would approve that fiscal year being included until there is some indication that the executive order will still be in place at that time.

**Q11: For the essence of time, can General Funds be used to help with rent payments and then be reimbursed to the jurisdiction once all third-party income is verified and the client is deemed eligible?**

A. This could be done, but it will be at the risk of the local government that all funds provided out of general revenue may not be eligible for reimbursement.

## RENTAL ASSISTANCE

**Q12: Could you provide information on where folks can apply for rental assistance?**

A: Have residents contact the local SHIP office to determine what, if any, rental assistance is available in the community. For the contact information for each jurisdiction, use this link:

<https://www.floridahousing.org/programs/special-programs/ship---state-housing-initiatives-partnership-program/local-government-information>

**Q13: SHIP funds in our county have not been used for rental assistance the past, what is the best way for us to coordinate those services without duplication?**

A. Coordinate services with your Continuum of Care and other local non-profit organizations that provide similar services.

**Q14: The SHIP assistance discussed in the Rent Assistance webinar is for households in any rental situation, right? Not just in a Low income or SHIP assisted housing.**

A. You are correct as long as the applicant qualifies under SHIP income limits. You also might consider from a policy decision to prioritize lower income households, though not required.

**Q15: 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.

**Q16: How do we know if our applicants have received CARES act funding from other sources before using our limited grant funds?**

A: Consider using a duplication of benefits form that will require reimbursement of funds if the assistance provided by the local government is duplicated from another resource. You can include questions on your program application asking the applicant if they are receiving financial assistance from another source related to COVID-19. Due to the many different types of funding made available through the CARES Act, any questions on a program application would be specific to the type of financial assistance being applied for so as not to confuse the applicant. For example, they could be receiving unemployment assistance and



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then mark that they are receiving COVID-19 financial help. Additionally, having a coordinated effort between organizations providing the same types of assistance (e.g. security deposits, eviction prevention) will reduce duplication. Having a centralized point for all people applying for financial assistance would be helpful. If you are referring to rental payment assistance, it is unlikely you will duplicate the funding. When providing rental assistance, you would contact the landlord to see how much the household owes and then pay the landlord directly.

**Q17: I may have missed this but if we determined that the applicant was over income before COVID-19, but now income eligible, will they be eligible for our SHIP Rental Assistance now.**

A. Yes, they might be. See the slide from the Rent Assistance webinar with recommendations of priority. In the scenario you write about, this applicant could get rent assistance AFTER all who were SHIP eligible pre-COVID receive assistance.

**Q18: The Rent Assistance webinar discussed paying an applicant's rent. Can we assist persons living in motels/hotels?**

A. Yes, if you are providing rental assistance under a Disaster strategy and the person is living in a hotel due to an eviction caused by recent unemployment or under employment, you can provide this assistance. SHIP funds do not go far when paying for hotel stays, so explore if applicants in these circumstances could benefit from SHIP paying for a month to month rental instead of a hotel.

**Q19: Is it possible to provide rental assistance and install a toilet or new door to meet the construction set-aside?**

A. No. FHFC would prefer that you ask for a waiver of the construction set-aside.

**Q20: Would it be acceptable to provide a one-time assistance amount? For instance, \$3,600 for three months based on rent. If the rent is \$1,200, could we give three months of rent to the landlord?**

A. You can award it that way but would still pay it out monthly in case circumstances change.

**Q21: Can we provide rent payments for people in mobile homes or do the same mobile home provisions apply?**

A. The provisions in the statute covering mobile homes will apply. You will need to submit a request for a waiver from FHFC to provide assistance to mobile homes that do not meet the statutory requirements.

## MORTGAGE ASSISTANCE

**Q22: How do we get a W-9 if we are providing mortgage assistance? Usually it is not easy to get a W-9 from a bank.**

A. Document a mortgage assistance application with a monthly mortgage payment statement provided by from the homeowner.

**Q23: Is there consideration for individuals who are self-employed?**

A. Self-employed applicants will need to provide proof of loss of income. This can be done by providing a recent profit and loss statement.



**Q24: If we pay for the mortgage or rent assistance, do we have to put a lien on the property?**

A. Most disaster or rental assistance is provided as a grant. Mortgage assistance can be provided as a grant or a loan.

**Q25: Can an applicant provide proof of filing for unemployment as verification that they were laid off?**

A. Yes.

## ELIGIBILITY DOCUMENTATION

**Q26: 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.

**Q27: Can we accept electronic signatures (fax/emailed) on the SHIP income certification forms due to our office being closed to the public?**

A: Yes, you can. There is nothing in the SHIP statute or the rule that would prohibit the use of electronic tenant files or signatures. Chapter 668., subsection 668.50 (7) Fla. Stat. states: LEGAL RECOGNITION OF ELECTRONIC RECORDS, ELECTRONIC SIGNATURES, AND ELECTRONIC CONTRACTS.

- (a) A record or signature may not be denied legal effect or enforceability solely because the record or signature is in electronic form.
- (b) A contract may not be denied legal effect or enforceability solely because an electronic record was used in the formation of the contract.
- (c) If a provision of law requires a record to be in writing, an electronic record satisfies such provision.
- (d) If a provision of law requires a signature, an electronic signature satisfies such provision.



Another acceptable process that can be used during this social distancing period is addressed in an answer above about guidance from the SHIP Monitors. The local government staff alone may 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.

**Q28: The Rent Assistance webinar discussed guidance from the SHIP monitors about signatures. Does the option of the applicant signing later apply to contracts for work to begin on a rehabilitation project?**

A. Yes, it could be used as a last resort, however consider other options that can be used for legally binding documents such as Remote Online Notarization, the use of electronic signatures, or mailing the document for signature and requiring two witnesses.

**Q29: Would stimulus funding expected to be received be part of household income?**

A. No. this is a one-time payment. If deposited in a bank account, it would be considered an asset.

**Q30: What tips can you offer related to third party verification while working from home?**

A. 4350.3 allows for verbal verifications of income and assets. You must document the company, who you spoke with, their title, the date time and the information provided, your name and title. You can also use mail, e-mail, scanned documents that can be e-mailed, or photos of things like pay stubs and bank account statements.

**Q31: Do you think that self-certification will be an option for purposes of expediting assistance.**

A. No. Local governments are still required to try to obtain third party verifications even if there are delays. Self-certifications will only be used as a last resort when all efforts to obtain third party verification have been exhausted.

**Q32: Will there be any changes on what is required regarding documentation and application requirements to fast track assistance? May we use self-certification of income?**

A: See the written direction here from Florida Housing's SHIP Monitors. It addresses the 'Family Certification method (self-certification)', which is the same as the SHIP disaster self-certification form.

Among the highlights of their guidance: COVID social distancing may cause some delays to applications, verifications and certifications. A delay in obtaining verifications or all signatures is not reason enough to skip directly to self-certification, however. Florida Housing's SHIP Monitors write:

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's SHIP Compliance Monitoring section 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 applicant/resident will provide the proper signature.



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The review of documents provided by an applicant/resident is acceptable third-party verification according to the HUD 4350.3 guidance. However, again per the 4350.3, it's acceptable to resort to the Family Certification method (self-certification) if the information cannot be verified by another acceptable verification method. In these instances, the owner must include in the resident file a description of the attempts first made to obtain the actual third-party verification documents.

Please note that HUD requires a Family Certification to be notarized and include a statement to the veracity of the information provided; HUD allows an owner to witness the family signature(s) in lieu of notarization. This same allowance will apply to LG staff administering SHIP.

Paragraph 5-18 E in the 4350.3 includes guidance for documentation requirements when third-party verification isn't available. Currently, the existence of extenuating circumstances that might delay actual execution of a document is not reason enough to skip directly to Family Certification.

When there is a delay in obtaining and/or witnessing the actual family signature(s) due to extenuating circumstances this fact should be noted initially and then when the signatures are subsequently obtained a reference to the original statement can be made to explain what would otherwise appear to be tardy execution of the "Family Certification" (similar to a "true and correct as of [date]" statement). The date the signature was actually obtained must be entered on the document.

## ADMINISTRATIVE PROCEDURES

**Q33: 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. Also, the status of SHIP offices is a topic in the COVID-19 SHIP survey. Each local government that completes this survey at <https://www.surveymonkey.com/r/CX2DL2V> will receive survey results.

**Q34: 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. You can learn about the status of other SHIP rehabilitation programs by completing the COVID-19 SHIP survey. Each local government that completes this survey at <https://www.surveymonkey.com/r/CX2DL2V> will receive survey results.

**Q35: 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 to 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.

**Q36: Can local governments contract with counseling agencies to provide foreclosure prevention or eviction prevention counseling services?**



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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 available at <https://www.hud.gov/states/florida/homeownership/hsgcounseling>.

**Q37: Is there an established limit on how much SHIP funding can be used for providing housing counseling?**

A: There is not a specific limit on the amount of funds that can be used for counseling, but funds spent on counseling do not comply with any set-asides. Since at least 75 percent of funds must be devoted to construction/rehabilitation and another 10 percent is often devoted to administration, usually only 15 percent of an allocation is available for counseling. However, during this period of COVID-19 response, a local government may receive a waiver of the homeownership and construction set-asides to spend more funds on foreclosure counseling, rent assistance and other COVID-19 emergency response.

**Q38: 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.

## OTHER SHIP TOPICS

**Q39: 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.

**Q40: Will I be able to submit an application for SHIP rental assistance after this webinar?**

A. If you are interested in applying for rental assistance, use the link below to contact the local SHIP office in your community and find out if they have a rental assistance strategy and how to apply for assistance. <https://www.floridahousing.org/programs/special-programs/ship---state-housing-initiatives-partnership-program/local-government-information>

**Q41: Will you create a library of these webinars (and resources) on your FHC website?**

A. Yes. If you got to our website at <https://www.flhousing.org/covid-19-housing-related-resources/> you will find all of our recorded webinars and handouts. These are usually posted within 1-2 days.

**Q42: What is the process for receiving public input to any local SHIP rental assistance program?**

A. When a local government writes its three-year Local Housing Assistance Plan it solicits public input in accordance with the process outlined in the plan. Under the executive order, the local government can move forward with disaster assistance and is not required to get input from the public.



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## 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.



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**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.

*(Continued on next page)*

- 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.

**Q7: Has the State talked about whether they are planning to apply for waivers for the Balance of State funds?**

A: The State Office on Homelessness is currently collecting feedback from the Continuums of Care on the waivers related to the new HUD Memorandum published on April 1st.



**Q8: Who will be working on updating the Consolidated Plan for waivers?**

A: Each recipient of HUD CPD funding is required to have a consolidated plan. The recipient is responsible for following HUD regulations pertaining to substantial amendments. HUD's Memorandum with the Super Waiver does provide waivers for Consolidated Plan requirements pertaining to citizen participation and comments. For the State of Florida, the Department of Economic Opportunity is the lead state agency responsible for the development of the Consolidated Plan.

**Q9: How do PPP loans impact my federal grants (e.g. CoC Planning grant)?**

A: The SBA Paycheck Protection Program (PPP) should not interfere with other federal grants you may be receiving, as the loan or grant is covering loss to the nonprofit. You cannot borrow money for staff unless you can certify that the loan is necessary to support your ongoing operations. For example, if your employee and compensation levels are maintained at the CoC Lead Agency utilizing a CoC Planning Grant there would be no need to apply for a loan or grant to cover those costs. You can only receive a PPP loan if your organization can certify in good faith that the current economic uncertainty "makes the loan necessary to support your ongoing operations." However, you could still use the PPP funds for rent, utilities, and mortgage interest if the economic situation requires, keeping in mind that non-payroll costs in excess of 25% of the total award may not be fully forgiven.

**Q10: How do local non-profits access the ESG and the Public Assistance funds?**

A: The Public Assistance Grant Program is available through FEMA and you can find more information at its website. <https://www.fema.gov/public-assistance-local-state-tribal-and-non-profit>.

HUD posted the communities receiving ESG funding at [https://www.hud.gov/program\\_offices/comm\\_planning/budget/fy20/](https://www.hud.gov/program_offices/comm_planning/budget/fy20/). Nonprofits interested in applying for those funds must contact their local HUD recipient.

**Q11: What will the spending deadline be for ESG [CARES Act]?**

A: September 30, 2022.

## 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?**



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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](mailto: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/>

**Q4: Does the construction of housing essential activity cover rehab of existing homes?**

A: Yes. Governor DeSantis' "Safer at Home" order deems housing rehabilitation an essential activity.

**Q5: If we use current CDBG unexpended funds can we replace them with the CARES CDBG when it arrives?**

A: If a grantee has uncommitted CDBG funds, it may be used for eligible activities to respond to COVID-19, but this would require amending the action plan to describe the activity and how the funds will be used. Once expended, the CDBG funds cannot be replaced with CARES CDBG because the CARES funding is to be used to prevent, prepare for, and respond to COVID-19.

**Q6: What guidance can you give to organizations taking advantage of the PPP Loans and HUD grant compliance?**

A: For the PPP loan, be sure to follow the program guidelines so the loan will be fully forgiven. Forgiveness is based on using the funds as the program dictates and the organization quickly rehiring or maintaining salary levels. To ensure full forgiveness, spend at least 75% of the loan on payroll costs with the rest towards rent, utilities, and mortgage interest.

**Q7: Any idea how tenant-based vouchers will be issued to PHAs?**

A: It is unlikely Public Housing Authorities will be issuing new Housing Choice Vouchers. Instead the funding for PHAs from the CARES Act will most likely be used to further subsidize current tenants as their income decreases and the PHA's housing assistance payment (HAPS) increases.

**Q8: How can clients have access to their Social Security verification letters, besides the website alternative, to comply with requirements for voucher recertifications?**

A: Each Public Housing Authority is creating their own plan to update policies on issues like recertifications. HUD has created the PIH (Office of Public and Indian Housing guidance on what PHAs need to consider. More guidance will be forthcoming.

[https://www.hud.gov/sites/dfiles/PIH/documents/COVID19\\_FAQ\\_PIH\\_3-30-20.pdf](https://www.hud.gov/sites/dfiles/PIH/documents/COVID19_FAQ_PIH_3-30-20.pdf)

**Q9: Regarding PPP, which lenders provide the SBA 7(A) in Florida?**

A: Several lenders in Florida and nationally are providing PPP loans. Check with your current lending institution to start. We will be posting a list of participating lenders soon.

**Q10: Is it really \$600 a week for everyone approved for unemployment?**



## FLORIDA HOUSING COALITION

A: The Department of Labor states "Under the Federal Pandemic Unemployment Compensation (FPUC) program, eligible individuals who are collecting certain UI benefits, including regular unemployment compensation, will receive an additional \$600 in federal benefits per week for weeks of unemployment ending on or before July 31, 2020. Additionally, the Pandemic Emergency Unemployment Compensation (PEUC) program allows those who have exhausted benefits under regular unemployment compensation or other programs to receive up to 13 weeks of additional benefits. States must offer flexibility in meeting PEUC eligibility requirements related to "actively seeking work" if an applicant's ability to do so is impacted by COVID-19."