



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.

Update the SHIP Disaster Strategy or rental strategy by increasing the maximum award (if needed) and by adding this text:

SHIP disaster funds may be used for items such as, but not limited to:

Temporary rent and utility payments for up to 12 months for tenants financially impacted by COVID-19

Temporary mortgage and utility payments for up to 12 months for homeowners financially impacted by COVID-19

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). Email your technical revisions in underline and strikethrough format for approval along with waiver requests to Robert.dearduff@flhousing.org. The revision does not have to be approved by your city or county commission. Once Mr. Dearduff reviews and approves the revision, he will waive some set-asides and waive SHIP advertisement requirements so you may start announcing assistance, completing other outreach and accepting applications.

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



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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).

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).

Q5: 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.

Q6: 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



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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

Q7: 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. 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).

ELIGIBILITY DOCUMENTATION

Q8: 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.

Q9: 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.

Q10: 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.

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



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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

Q11: 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.

Q12: 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.

Q13: 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.

Q14: 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 available at <https://www.hud.gov/states/florida/homeownership/hsgcounseling>.

Q15: 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.



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Q16: 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

Q17: 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.

Q18: Can you provide a website for rental assistance available for hospitality workers?

A: Every local government that receives federal and state funds to assist individuals under this disaster will determine the application process and specific requirements for its program including assistance to those impacted by the disaster that work in the hospitality industry. Here is the link to local governments in Florida that administer the SHIP program. The list is broken down by Cities and Counties. <https://www.floridahousing.org/programs/special-programs/ship---state-housing-initiatives-partnership-program/local-government-information>



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.

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?



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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/>