



Management Bulletin #495

DATE: April 9, 2020
TO: Owners/Agents of IHDA Properties
CC: Asset Management Department Staff
FROM: Asset Management Department, IHDA
RE: IHDA Asset Management COVID-19 FAQ

SUMMARY:

IHDA Asset Management COVID-19 FAQ

1. What can property managers do if tenants are unable to pay rent?

- Encourage residents to file unemployment insurance claims. [Governor Pritzker and the Illinois Department of Employment Security \(IDES\)](#) have announced that the administration will file emergency rules to clarify that people who are unemployed due to COVID-19 can qualify for unemployment benefits to the full extent permitted by federal law.
- Refer resident to local food and utility assistance programs.
- Conduct an interim recertification if the resident is already receiving rental assistance.
- Consider if there are other property based, or local rental assistance programs that might be available for such residents. Some additional resources are available here:
 - [Other Housing Resources](#) on ILHousingSearch.org,
 - [Additional Rental Help](#) on IHDA.org.
- Consider payment plans that may take account of future income, including unemployment insurance.
- However, owners of housing with Section 8 should be aware that HUD has advised public housing authorities that pending federal stimulus payments made directly to tenants are temporary, non-recurring payments. They are therefore excluded from income for purposes of income recertifications (per 24 CFR 5.609).
- Keep IHDA Informed: If by mid-month, your property is experiencing larger than usual rent variances, inform your IHDA Financial Analyst.

2. Can I evict tenants for non-payment of rent, or for other causes?

Governor Pritzker has put a moratorium on enforcement of evictions for the duration of the Governor's Disaster Proclamation, most recently extended to April 30th. Technically,

landlords may still file for eviction, but the Governor has ordered municipalities not to enforce evictions. IHDA encourages owners to show forbearance in filing evictions for non-payment of rent.

3. Can I obtain a waiver for tenant income recertifications during the emergency?

IHDA is not currently authorized by HUD or the IRS to provide waivers on tenant income certifications due to COVID-19. Owners and agents are encouraged to conduct interviews via telephone or through the use of teleconferencing options, and to receive documents electronically, including verifications and electronic signatures.

HUD Office of Multifamily Housing has issued a set of [Questions and Answers for Stakeholders](#) related to COVID-19. Question 7, on page 7, addresses income certifications. In response to extenuating circumstances related to COVID-19, HUD's guidance addresses:

- Allowing self-certifications for interim and annual certifications,
- Allowing alternate or delayed signatures,
- Alternate transmission for documentation, and
- Using extenuating circumstance codes in TRACS.

Under the Robert Stafford Disaster Relief Act of 1974, states and localities may request regulatory relief from federal agencies. IHDA is working with the National Council for State Housing Agencies (NCSHA) to request additional regulatory relief from HUD and the IRS. IHDA will keep owners and agents informed of such regulatory relief if it is granted.

4. If there are delays in processing Interim Certifications due to COVID-19, will that affect the effective date of the new tenant rent?

The HUD Midwest Regional Office has provided the following guidance on interim certifications:

"New clarification has been issued to supplement HUD's guidelines on the processing of interim recertifications. Please be advised that per HUD Handbook provisions an interim recertification is effective as of the first date of the month immediately after the month in which the triggering event for the interim recertification occurs. For example, if the triggering event for an income reduction occurred in March 2020 and the interim recertification is completed on April 10, 2020 then the effective date of the interim recertification is April 1, 2020."

5. What is the status of IHDA Physical Inspections?

IHDA is postponing physical inspections at all properties for the duration of the Illinois Governor's Disaster Proclamation.

6. What is the status of IHDA Management and Tenant File Reviews?

In Management Bulletin #492, IHDA advised that all on-site management reviews will be converted to desk reviews, and that all tenant file reviews will be conducted remotely using BDS for the duration of the Illinois Governor's Disaster Proclamation.

Additional guidance on submission of documents through e-mail and BDS will be provided by the IHDA Asset Manager prior to each scheduled review, and through the *BDS User Guide* on the [Property Manager's page](#) of IHDA's website.

7. What if property management staff have limited access to tenant files or other documents needed for IHDA' desk review?

IHDA will ask that property managers continue to provide scanned documents, including tenant files, management documents, and corrections to findings.

At the same time, IHDA is aware property staff may have limited access to files. Keep your Asset Manager informed of difficulty accessing documents. Requests for extensions for submissions should be made in writing and describe (a) the extenuating circumstance leading to the request, and (b) a timeframe within which submission can reasonably be made.

ATTENTION:

Due to concerns surrounding COVID-19 (i.e. Coronavirus), IHDA will not be accepting visitors at our offices until further notice. Many on-site meetings are being held remotely or have been postponed. With no on-site meetings or visits, IHDA staff will continue to be available via email and telephone. We also urge you to check the IHDA website or call (312) 836-5200. Your patience is appreciated as we all adjust to this new work environment.