DATE: April 29, 2020

TO: Owners/Agents of HOME Properties

CC: Asset Management Department Staff

FROM: Asset Management Department, IHDA

RE: HOME COVID-19 Waivers

SUMMARY:

HUD Office of Community Planning and Development (CPD) has announced regulatory waivers that impact owners and agents of properties financed with the federal HOME Program.

The waivers allow IHDA to delay on-site inspections and reviews, and to accept self-certifications to verify income for applicants for HOME funded housing who need emergency assistance due to COVID-19. Both waivers extend through December 31, 2020.

On Site Inspections and Reviews: As allowed under the waiver for On-Site Inspections, IHDA will delay triennial HOME physical inspections for existing properties for the duration of the COVID-19 emergency. IHDA will continue to conduct triennial reviews of rent and income requirements electronically, but may defer such reviews if the project owner is unable to make documentation available.

The waiver does not apply to Initial Inspections of rental properties upon completion of construction or rehabilitation. Further, IHDA will be required to complete all inspections delayed under this waiver within 120 days of December 31, 2020. Any rent and income reviews that have been deferred must be conducted within 90 days of December 31, 2020.

Self Certification: HOME regulations require that Initial tenant income certifications be verified using 2 months of source documents, such as paystubs.

As allowed under the waiver for Income Documentation, IHDA will accept the use self-certification in lieu of the 2 months of source documents for applicants in need of emergency assistance. Such applicants include persons or families who have lost employment or income due to COVID-19, as well as persons or families who are homeless.

Effective through December 31st, such applicants may self-certify their income as described in 24 CFR 92.203(a)(1)(ii):
"Obtain from the family a written statement of the amount of the family's annual income and family size, along with a certification that the information is complete and accurate. The certification must state that the family will provide source documents upon request."

HUD emphasizes that the certification must include all household income, including any unemployment or emergency benefits. However, household stimulus payments of up to $1,200 and the temporary $600 per week federal enhancement to unemployment insurance provided by the CARES Act are not to be included in calculations of income.

If you have questions about these HOME waivers please contact your IHDA Asset Manager.

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.