

## Questions and Answers for Office of Multifamily Housing Stakeholders

### Coronavirus (COVID-19)

Last Updated: March 12, 2020, 11:00 a.m., ET

#### Emergency Preparedness

**Q1: Who is coordinating COVID-19 efforts for Multifamily Housing (MFH)? Who will be the point of contact for housing providers?**

A: Owners and agents should contact their field MFH Account Executive or Resolution Specialist for property specific inquiries. Jeff Little, the Associate Deputy Assistant Secretary for MFH Programs, is the main point of contact for Multifamily stakeholders.

**Q2: Have MFH Field Offices been given guidance on how housing providers should prepare and respond to COVID-19?**

The Office of MFH provides regular direction to field staff. On March 3, the Office sent an email message to external stakeholders that encouraged stakeholders to share information from the Centers for Disease Control and Prevention (CDC) on the Coronavirus with residents, stakeholders, and others.

**Q3: What emergency preparedness steps does HUD recommend or require property owners and agents take?**

A: Owners and agents should generally follow CDC guidelines and the directions given by local health officials for emergency preparedness. Chapter 38 of [Handbook 4350.1](#), Emergency and Disaster Guidance, should also be consulted.

The CDC provides guidance for [communities, businesses and schools](#) that can assist housing providers.

#### Resident Health

**Q1: In the event of a confirmed COVID-19 case at a HUD-assisted property, what steps should property owners and managers take to protect residents, staff, and the community?**

**A:** MFH recommends property owners and agents follow CDC guidelines and the direction of local health officials, especially in the event of property quarantine.

**Q2: How should housing providers assist residents in accessing continued critical services from home- and community-based providers in the event of a quarantine or if community service providers close temporarily?**

**A:** HUD encourages property owners and agents follow Centers for Disease Control guidelines and the direction of local health officials in all cases, including within the context of home and community-based service providers.

**Q3: What steps is HUD taking to make sure that Fair Housing obligations will still be met in the event of an emergency?**

**A:** Stakeholders are reminded to ensure that their responses remain faithful to obligations under the Constitution, Fair Housing Act and related regulations. Exigencies associated with important and timely response to issues surrounding COVID-19 are not the basis for unlawful discrimination based on race, color, religion, national origin, sex, disability or familial status.

**Q4: It is thought that many seniors and people with disabilities are particularly susceptible to illness. What kind of communication and resources is HUD providing to communities to reassure residents and property management staff, and prepare them in the event of a confirmed COVID-19 case on site?**

**A:** We encourage all parties to access information about the health impacts and proper handling of COVID-19 cases from the CDC, and/or state or local health officials.

We intend to provide regular updates to stakeholders and will continue to send written updated communications via email to national stakeholder groups for forwarding to their members, and to HUD Multifamily Field Offices for distribution to stakeholders in their jurisdiction. Where applicable, we will encourage stakeholders to forward COVID-19 communications from HUD to communities and residents.

**Q5: Does HUD have guidance available on infectious disease preparation and response?**

**A:** See information on the Coronavirus from the CDC's [Coronavirus web site](#).

**Q6: If a person under quarantine has additional family members who need to be kept separate what are a property manager's options for meeting those needs? What if managers are being asked to use vacant units for quarantine?**

A. Resident requests to occupy vacant units or temporarily relocate should be verified before being granted. Verification could include written communication from a medical health professional or through communication with the local health department. Managers may use electronic and telephonic communication to perform verification.

## **Policy and Operations**

### **Q1: Does HUD plan to issue guidance on quarantine procedures for HUD-assisted housing that serves predominantly older adults?**

A: HUD encourages property owners and agents to follow CDC guidelines on quarantine procedures and the direction of local health officials. Stakeholders should reference Chapter 38 of [Handbook 4350.1](#), *Multifamily Asset Management and Project Servicing*, which covers Multifamily emergency and disaster guidance.

### **Q2: Will HUD make rent payment relief or additional assistance available for Project-Based Rental Assistance and Project Rental Assistance Contract units if tenants fall under adverse conditions due to COVID-19?**

A: Multifamily Housing encourages all owners to work with impacted residents and families to adjust rent payments, enter into forbearance agreements, and lessen the impact on affected residents. At this time, no additional subsidy funding has been made available.

### **Q3: What emergency funds can owners and agents access for outbreak preparedness and response (including extra supplies, additional administrative hours, and staff overtime), and what kind of approval do housing providers need from HUD in order to access the funds?**

A: Multifamily property owners and agents can access property operating accounts for all reasonable and necessary COVID-19 related preparedness and response actions, including supplies, staff hours, and overtime. No advance HUD approval is required to access operating account funds.

To the extent that owner advances are required, owners should receive HUD approval in advance, especially if the owner expects repayment before the distribution of annual (or semi-annual) surplus cash. For those properties with reserve for replacement accounts, funds should be accessed according to current policy in Handbook 4350.1, Chapter 4, for eligible items. If the owner is seeking to use reserve for replacement funds for non-eligible uses, approval must be received from HUD field staff in advance.

### **Q4: In the event of an outbreak in a locality with HUD-assisted housing, what regulatory waivers will apply for HUD housing?**

A: HUD will consider policy, Handbook, and regulatory waivers on a case-by-case basis with the intention of providing flexibility to owners and agents to respond to unique needs.

**Q5: Is HUD planning to update their Chapter 38 on emergency preparedness to include infectious disease protocol?**

A: Multifamily plans to use lessons learned from the COVID-19 response in the update to Chapter 38. The Chapter is in the process of being redrafted. Stakeholders will be able to comment when the draft chapter is posted to the Multifamily Drafting Table.

**Q6: Will HUD be making COVID-19 prevention training available for property management and resident services coordinator staff? Will HUD be providing technical assistance for housing providers and residents?**

A: HUD recommends that property managers and service coordinators avail themselves of all relevant training and supplies at the local, state, and federal level.

**Q7: Is testing for the virus for property staff an eligible cost, and if so, under what source of funding? How about residents?**

A. No, this is not an eligible cost.

**Q8: Can I allow residents with COVID-19 or in quarantine extra time to complete recertification if it is due during an outbreak?**

A. Yes, you may consider extension requests for an active case of COVID-19 or where a resident has been advised to quarantine. Management should verify the reasons for the extension request, which may include written information from a medical or other health professional.

**Q9: What steps should managers take for subsidized residents who experience a reduction in income from missing work due to the COVID-19?**

Current policy states that owners must process an interim recertification if a tenant reports a decrease in income that will last for more than one month. The owner should already have this policy in writing and apply it consistently. See [handbook 4350.3, chapter 7, section 2](#).

**Property Reviews and Inspections****Q1: Will HUD temporarily defer REAC and other inspections, and Management and Occupancy Reviews (MORs) and how will HUD notify owners?**

A: HUD may adjust inspections or MORs in accordance with guidance provided by local health officials. HUD will update owners directly on any changes to scheduled inspections or MORs.

**Q2: What should owners/property managers do if tenants refuse entry to inspectors, citing fears of COVID-19?**

A: Until federal, state, or local public health officials counsel otherwise, owners and agents should follow published guidance covering apartment inspections. In this case, Paragraph 20 of the [HUD Model Lease](#) covers the rules governing the landlord's access to a tenant's apartment.