

COVID-19 FAQs for Public Housing Agencies



Version 2
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1.0 Key Resources

- [Proclamation on Declaring a National Emergency Concerning the Novel Coronavirus Disease \(COVID-19\) Outbreak](#)
- [HUD COVID-19 \("Coronavirus"\) Information and Resources](#)
- [CDC Coronavirus \(COVID-19\)](#)
- [Disaster Distress Helpline \(SAMHSA\)](#)
- [Families First Coronavirus Response Act](#)
- [Coronavirus Aid, Relief, and Economic Security \(CARES\) Act](#)

Notice: The Coronavirus Aid, Relief, and Economic Security (CARES) Act, signed by the President on March 27, 2020, provides new flexibilities and waiver authority for HUD to help PHAs respond to the COVID-19 pandemic. Answers to some of the questions in this FAQ will change as HUD develops more detailed guidance. This version includes new questions and updates to answers originally posted on March 13, 2020. Updates to questions are flagged.

2.0 Emergency Preparedness (EP)

EP1. Who can I contact with questions about emergency preparedness efforts for Public and Indian Housing (PIH)? (Updated)

A. PIH has established a dedicated email address for questions from PHAs at PIH-COVID@hud.gov.

EP2. How should my PHA prepare for COVID-19 virus infections among our assisted families? (Updated)

A. HUD recommends that PHAs that administer public housing or HCV assistance consider strategies to limit the spread of COVID-19, plans to address the potential impacts that may occur if a resident contracts COVID-19 virus or efforts to support a state or local quarantine directive. These could be addressed in a pandemic emergency or continuing operations plan.

Some topics to consider in your plan include:

- Staff Management and Communication
 - Reviewing personnel policies and labor agreements
 - Determining essential and non-essential positions as well as remote work options
 - Communication with union(s)
 - Providing access to health care providers and/or police
 - Guidance from CDC and Occupational Safety and Health Administration (OSHA) on worker protection and personal protective equipment (PPE)
- Resident Communication
 - Managing short-and long-term quarantines in a unit or a property
 - Working with resident groups
 - Providing access to health care providers and/or police if requested
 - Guidance from CDC and state, local health departments
 - Residents with special needs, and any reasonable accommodations that may be requested

- Encouraging residents to self-report illness or quarantines
- Continued operations of supportive services programs while closed and/or teleworking
- Resident Safety and Security
 - Policies, procedures and other measures to protect vulnerable populations
 - Identifying local service providers (e.g. private grocery delivery)
 - Residents with special needs, and any reasonable accommodations
 - Internet connectivity
- Modifying Regular Processes
 - Unit inspections
 - Rent Collection
 - Recertifications
 - Unit maintenance (if not performed by the owner)
 - Hardship policies
 - Public meetings
- Additional Considerations for PHA Boards of Commissioners
 - State, local or tribal laws about public meetings
 - Changes to standard communication methods
 - Procurement policies and approvals
 - Other PHA policies (e.g., Admissions and Continued Occupancy Policy (ACOP) and HCV Administrative Plan)

EP3. What types of jobs at the PHA are considered essential?

A. As part of emergency planning, all PHAs should review employees and their roles, and consider which functions are essential in case of state-mandated closures or a local shelter in place requirement. This may already be part of your personnel policy or labor agreements. There is no HUD guidance on which employees should be considered essential by the PHA. That determination rests solely with the PHA, and PHAs should consult state guidance to determine who is covered as essential, and any exemptions. Generally, HUD encourages PHAs to continue operations that can be done remotely, and to do what is necessary to ensure the safety of the residents and security of the property. For example, PIH considers financial operations, such as making payments to landlords a critical function. Additionally, PHAs must ensure that any reported exigent health and safety issues are resolved.

EP4. If my PHA is asked to do specialized cleaning of a unit or building, what guidance should I follow? (Updated)

A. The following websites provide useful information for PHAs regarding specialized cleaning of units:

- CDC’s main website: www.cdc.gov/coronavirus/2019-ncov;
- Cleaning for community areas: [Interim Recommendations for US Community Facilities with Suspected/Confirmed Coronavirus Disease 2019](#);
- Cleaning for a household: [Interim Recommendations for US Households with Suspected/Confirmed Coronavirus Disease 2019](#);

- CDC’s guidance covers recommended disinfectants and personal protective equipment (PPE). Additional information on disinfectants is also available at www.epa.gov/coronavirus; and
- Guidance for workers and PPE is also at www.osha.gov/SLTC/covid-19/; and
- Your local or state health department may have additional guidance.

EP5. What are HUD’s procurement policies for PHAs to meet response needs during this time (e.g., specialized cleaning)?

A. Federal Regulations at 2 CFR § 200.320(f) permits a PHA to procure from single source through noncompetitive proposals. A PHA can solicit a proposal from one source only when one or more of the following circumstances apply: (1) An item is available only from a single source; (2) A public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation; (3) HUD expressly authorizes noncompetitive proposals in response to a written request from a PHA; or (4) Competition is determined inadequate after solicitation of a number of sources. PHAs must maintain in their files, however, a rationale of the single source proposal and cost analysis (i.e., proposed cost data, cost projections, evaluation of specific elements of cost and profits). Labor costs are based on the going market rate at the time. Conflict of interest requirements continue to apply in this situation.

3.0 Operational Concerns (OC)

OC1. Will the Real Estate Assessment Center (REAC) suspend unit inspections in properties subject to a quarantine?

A. Until further notice, REAC is postponing property inspections for all PIH and Multifamily properties. Where there is an exigent circumstance or reason to believe that there is a threat to life or property at a specific location, inspections will be conducted by HUD quality assurance inspectors in compliance with CDC guidelines.

OC2. Our PHA determined that given the extent of the outbreak in our area and the impact on our staff, we may have significant disruptions in regular services, including annual recertifications, submission of PHA Plans, and other required documents. Should I submit a waiver request? (Updated)

A. As part of planning efforts related to COVID-19, HUD encourages PHAs to evaluate which functions can be done remotely if the PHA office closes or staff are quarantined.

On March 27, 2020, the President signed the [CARES Act](#). This legislation provides HUD the ability to waive statute or regulations and impose alternative requirements to provide PHAs with flexibilities necessary to respond to COVID-19. Guidance on these waivers and alternative requirements will be forthcoming. In the interim, HUD encourages PHAs to take the necessary steps to ensure the health and safety of their staff, assisted families and properties.

PHAs should not submit COVID-19 waiver requests until new guidance is issued. PHAs that previously submitted COVID-19 related waiver requests to PIH_Disaster_Relief@hud.gov

will be notified via email that their waiver is being held for processing pending forthcoming guidance. If there are additional waiver requests not covered by the new authority and guidance, HUD will review and respond.

OC3. Will HUD adjust SEMAP scoring for the HCV Program for agencies that must cancel or delay HQS inspections?

A. Information will be provided about SEMAP in the forthcoming PIH waiver notice.

OC4. What is HUD's guidance on HQS inspections for PHAs that have halted or are considering halting HQS inspections for health and safety reasons. For new applicants and current residents who need to move into new residences, can we enter into a HAP contract for the new unit without having inspected the unit? (Updated)

A. For new residences, the United States Housing Act of 1937 requires that for each dwelling unit for which a housing assistance payment (HAP) contract is established, the PHA shall inspect the unit before any assistance payment is made to determine whether the dwelling unit meets housing quality standards. HUD is currently considering waivers and alternative requirements to provide administrative flexibilities around HQS inspections. This guidance will be informed by the CARES Act.

Currently, PHAs can utilize the following existing HQS inspection flexibilities:

PHAs can move to biennial inspections following the streamlining notice (PIH 2016-05) or triennial inspections if they are small rural PHAs under the established definition (Notice FR-6115-N-02).

PHAs can accept alternative inspections for periodic inspections (PIH 2016-05) and accept alternative methods for validating the correction of a deficiency (for example- a photo or owner certification).

PHAs can adopt the HOTMA Non-Life threatening (NLT) provision (PIH 2017-20) to allow families to move into units before unit has passed HQS, if it failed for non-life-threatening deficiencies. Additionally, PHAs, can adopt the HOTMA Alternative Inspection provision, allowing families to move in before an HQS inspection has been completed, as long as it has passed an acceptable alternative inspection.

If, for any reason, any of these change to inspections would require an update to a PHA's Admin Plan, HUD can waive the requirement for the Admin Plan changes to be formally adopted by the board in order to become effective (24 CFR § 982.54(a)). HUD is considering inclusion of waivers around updating the Admin Plan updates in the waiver notice. PHAs are encouraged postponing submission of such waivers at this time because on March 27, 2020, the President signed the [CARES Act](#). This legislation provides HUD the ability to waive statute or regulations and impose alternative requirements to provide PHAs with flexibilities necessary to respond to COVID-19. Guidance on these waivers and alternative requirements will be forthcoming.

OC5. Can we delay processing any incoming or outgoing HCV Ports until this crisis has ended to limit the amount of personal exposure our staff has with clients?

A. PHAs should continue to process incoming and outgoing ports similarly to how they are handling all operational issues at this time. PHAs are encouraged to consider processing portability requests through electronic communications, teleconferences, and phone communications to the extent practicable. HUD is not currently considering a portability waiver at this time.

OC6. Are the new stimulus payments to individuals considered income?

A. The pending stimulus payments directly to individuals and families would be excluded from income, as they are temporary, non-recurring payments (per 24 CFR 5.609).

OC8. Is there any guidance on how to deal with rent assisted Housing Choice Voucher and Project-Based Voucher (PBV) and public housing residents that may be asked to stay home if a COVID-19 outbreak occurs and they then cannot meet their rent obligations due to a loss of income? What are eviction prevention measures that can be taken? (Updated)

A. Assisted families in the public housing and HCV programs currently have the ability to report decreases in income. PHAs adjust the family share of the rent and granting hardship exemptions consistent with applicable regulations and the PHA's policies. A decrease in family income is not the basis for a termination of tenancy action (HCV program) or eviction from public housing.

In light of these extraordinary circumstances, HUD encourages PHAs and Owners to prevent the displacement of families through eviction which significantly increases the risk of homelessness and overcrowding. PHAs operating public housing may also choose to revise their hardship and minimum rent policies. The [CARES Act](#) includes a temporary moratorium (120 days) on evictions for nonpayment of rent, as well as fees and penalties related to nonpayment of rent. HUD will issue additional guidance.

OC9. Can a PHA apply for an extension to its Capital Fund obligation end date because of delays impacting the obligation of Capital Funds related to COVID-19? (Updated.)

A. Based on new authority in the [CARES Act](#), HUD intends to extend the obligation end date and expenditure end date for all open Capital Fund grants for one year.

OC10. Can Voucher Management System (VMS) reporting be delayed for impacted PHAs?

A. VMS data reporting is time sensitive as it is the basis for monthly disbursement calculations, cash reconciliations, trend analysis, storyboards, set-aside funding adjustment calculations and budget projections. PHAs that are not able to meet reporting deadlines due to circumstances beyond their control must notify their Financial Analyst at the Financial Management Center (FMC) at FinancialManagementCenter@hud.gov immediately to discuss their potential delay.

OC11a. Is HUD requiring the submission of Single Audits submissions under 24 CFR § 5.801(c) and 5.801(d)(1)?

A. The U.S. Office of Management and Budget (OMB) has allowed recipients and subrecipients of Federal funds that have not yet filed their single audits with the Federal Audit Clearinghouse as of March 19, 2020, and have fiscal year-ends from June 30, 2019 through March 31, 2020, to delay the completion and submission of the Single Audit reporting package, as required under Subpart F 2 CFR § 200.501- Audit Requirements, to six (6) month beyond the normal due date. For example, if your fiscal year ends on June 30, 2019, you do not have to submit until September 30, 2020.

To be consistent with OMB’s guidance, HUD is also extending the due of PHA’s audited submission to the REAC as required by 24 CFR 5.801(c) and 24 CFR 5.801(d)(1) by six months for PHAs with fiscal year end of 6/30/2019 through and including 3/31/2020. This extension includes both single audits and non-single audits. The table below provides the PHA’s that have been provided an extend due date by fiscal year.

FYE	Due Date	Extended Due Date
6/30/2019	3/31/2020	9/30/2020
9/30/2019	6/30/2020	12/31/2020
12/31/2019	9/30/2020	3/31/2021
3/31/2020	12/31/2020	6/30/2021

This extension does not require individual PHAs to seek HUD approval for the extension; however, recipients and subrecipients should maintain documentation for the reason for the delayed filing.

OC11b. If my agency is unable to submit our single audit by the normal OMB required deadline of nine months, will this impact our low-risk auditee status?

A. While HUD believes that a PHA that has taken advantage of this extension should not have their “low-risk auditee” classification under the criteria of 2 CFR § 200.520 (a) – “Criteria for a low-risk auditee” impacted solely on using the allowed extension authority, it is the PHA’s auditor, in their professional judgment, and not HUD who determines if the auditee should be a consider a high or low risk auditee.

OC11c. Is HUD providing an automatic extension for a PHA’s unaudited submissions as required under 24 CFR § 5.801(c) and 5.801(d)(1) – Uniform Financial Reporting Standard rule?

A. At this time, HUD is extending the reporting due date of PHA’s unaudited submission to the REAC as required by 24 CFR 5.801(c) and 24 CFR 5.801(d)(1) for PHAs with fiscal year end (FYE) of 12/31/2019 the new due date for these PHAs unaudited submission is now 09/30/2020. The table below provides the PHAs that have been provided an extended due date for their unaudited submission by fiscal year.

FYE	Due Date	Extended Due Date
12/31/2019	2/29/2020	9/30/2020
3/31/2020	5/31/2020	11/30/2020

This extension does not require individual PHAs to seek HUD approval for the extension; however, PHAs should maintain documentation for the reason for the delayed filing.

If a PHA's unaudited submission is not received by the extended due date, the submission is considered late and may result in the application of late penalty points, and eventually, a late presumptive failure (LPF) and the PHA may be subject to other HUD actions.

OC12. During the COVID-19 pandemic, will PHAs be held accountable for responding to the quarterly EIV discrepancy letters?

A. HUD is suspending the issuance of the quarterly EIV discrepancy letters for the second quarter. The Department is monitoring the COVID-19 pandemic and will determine when to reinstate the discrepancy letters.

OC13. How should staff that regularly interact with residents and their homes perform their regular duties if there is a quarantine? Activities may include in-person rent collection and income certification? (Updated)

A. PHAs should follow the guidance of their local and state health departments. PHAs should also plan now for alternative procedures for these processes, as they may become restricted during a quarantine or emergency orders. Options may include electronic transmission of funds, online teleconference calls, U.S. mail or secure collection boxes for payments. As part of planning, follow CDC guidance relative to the option selected. For more information, see CDC's guidance on personal protective equipment (PPE) and cleaning at www.cdc.gov/coronavirus/2019-ncov. **As a reminder, HUD does not mandate in-person meetings for income certification or recertifications.**

OC14. How do you conduct a HUD-required public meeting if the public may not be allowed to attend? (Updated)

A. Public meetings required as part of the annual planning process must still occur during a state or local emergency. If there is an active emergency order prohibiting gatherings, or other meeting size limitations enacted in your community, PHAs are permitted to hold such meetings remotely or online provided they can accept and post answers to questions submitted during the meeting. In selecting a streaming service, PHAs must ensure they can comply with Section 504 of the Americans with Disability Act. PHAs that continue with public meetings should follow the latest CDC, state, or local health department guidance.

OC15. Can we switch to electronic signatures for leases, procurement documents, and forms? Do we need a third-party verification software for validation? (Updated)

A. This answer depends on your state or agency's own policies. There are no requirements for third-party verification for these documents in the public housing or HCV regulations. Requirements for Annual Contributions Contract (ACC) amendments for Capital Funds are described in OC21.

OC16. Can I allow public housing residents that are on the flat rent rate calculation to opt for income-based rent even if they had already done so during the recertification year end date?

A. Allowing families to switch from flat rent to income-based rent should be covered in your agency's hardship policy. If the PHA determines that the family is unable to pay the flat rent because of financial hardship, the PHA must immediately allow the requested switch to income-based rent (24 CFR 960.253(g)). HUD requires PHAs to adopt written policies for determining when payment of flat rent is a financial hardship for the family and will issue additional guidance to assist PHAs with this process.

OC17. Can I switch my public housing residents on fixed incomes to either biennial or triennial recertifications?

A. In accordance with the U.S. Housing Act of 1937, PHAs must conduct an examination of family income at least annually. PHAs may conduct limited annual reexaminations of income for families where the family's income consists of 90% or more from fixed income sources, but the PHA would still have to perform a full examination in the initial year, and then every three years thereafter. During the second and third years after the initial income recertification, PHAs can adjust fixed sources of income based on the cost of living adjustment associated with that source of income. Also, the PHA must have policies in place on how they will adjust any non-fixed sources in the intervening years.

OC18. Public housing residents that are choosing to self-isolate have asked if we can suspend our Smoke Free policy so they can stay in their unit. Can we do that?

A. Residents are required to smoke outdoors at least 25 feet from the building or within a designated smoking area outdoors (See 24 CFR 965.653). HUD is not currently considering flexibilities to these regulations related to COVID-19 response.

OC19. Is HUD entertaining waivers of environmental review requirements based on COVID-19?

A. HUD's Community Planning & Development Office of Environment and Energy (OEE) manages the environmental review process for HUD. OEE is considering responses and efficiencies related to COVID-19 and will release guidance on HUD's website.

[Federal Register FR-6115-N-02](#), effective February 27, 2020, provides administrative burden relief and exempts 1519 small and rural PHAs from environmental review for activities with a project cost of \$100,000 or less. The exemption applies to any section 9(d) Capital Fund, section 9(e) Operating Fund, or section 8(o)(13) PBV eligible work activity with a project cost of

\$100,000 or less. Eligible PHAs may carry out exempt activities without a request for an environmental review or determination from a Responsible Entity or HUD. The eligible small and rural PHA list is published on hud.gov [“Section 209 Small Rural PHA List.”](#)

OC20. Is HUD entertaining waivers of the obsolescence test for demolition or disposition under Section 18 and 24 CFR 970?

A. HUD does not currently plan to exercise its waiver authority under the CARES Act to waive the statutory obsolescence test for demolition, nor does it see any rationale for doing so based on COVID-19. With regard to dispositions, there is no obsolescence test that must be met to dispose of a project; PIH Notice 2018-04 simply states that obsolescence as to the physical condition of a project is an example of a 24 CFR 970.17(c) disposition justification.

OC21. When HUD staff are teleworking, what is the best way to communicate with HUD? (Updated)

A. The best way to communicate with HUD is either by phone or via email as opposed to through the postal service or via an expedited delivery service. To the extent that an agency needs to transmit documents with signatures, the Department encourages PHAs to either sign the documents with legally binding digital signatures or to sign the documents – scan them – convert them to PDF and email the PDF document. There is one exception to this rule: because of specific language in HUD’s appropriation, the Department cannot accept Capital Fund Annual Contributions Contract (ACC) Amendments with digital signatures, but it can accept scanned Capital Fund ACC Amendments with written signatures in lieu of receiving hard copy signed ACC Amendments in the mail. If not already transmitted, PHAs should send the signed Capital Fund ACC Amendments by email since HUD offices are closed due to COVID-19. PHAs should **not** send Capital Fund ACC Amendments through the postal service or via expedited delivery service.

OC22. We received an award of vouchers through the FY 2019 Mainstream Voucher Program NOFA (FR-6300-N-43). It will be difficult to lease all of the awarded vouchers within the first year because we are suspending issuing new vouchers and inspecting new units as part of our efforts to keep our clients and staff safe during the COVID-19 outbreak. Can we have an extension on our awards effective date or the date by which we must lease the awarded vouchers?

A. The NOFA stated that PHAs must lease 80% of the awarded vouchers or budget within one year of the award becoming effective. The NOFA provides that HUD may recapture awarded funds if a PHA fails to meet this requirement. HUD understands that COVID-19 may impact a PHA’s ability to lease up their award within 12 months, and therefore, HUD will exercise its discretion to allow an additional six months for leasing of the FY 2019 Mainstream awards. PHAs do not need to request this extension from HUD.

OC23. We issued a Family Unification Program (FUP) or Foster Youth to Independence (FYI) voucher to a youth approaching their 25th birthday. As a result of COVID-19 restrictions in our community, they may turn 25 years of age before entering into a Housing Assistance Payment (HAP) contract. Can HUD waive the age limitation to allow the youth to lease up the voucher after they have turned 25?

A. The age limitation for FUP-eligible youth is statutory. HUD is considering the use of its waiver authority under the CARES Act to waive the age limit for FUP-eligible youth that are not able to enter into a HAP contract before turning 25 years of age. Absent this waiver authority, a youth must be no more than 24 years old at the time of PCWA certification as FUP-eligible and also at the time of HAP contract execution.

OC25. We have a case where the landlord is telling a tenant they will not renew her lease. The landlord is evicting the Section 8 program participant. The tenant is inquiring as to whether this is permissible in light of the coronavirus.

A. Under the regular tenant-based voucher program, there is no requirement to renew the lease. Eviction after nonrenewal of a lease is a state and local law matter. The [CARES Act includes a temporary moratorium \(120 days\) only on evictions for nonpayment of rent, as well](#) as fees and penalties related to nonpayment of rent. HUD will issue additional guidance.

In addition, some states and localities may provide additional protections to tenants with respect to lease renewals. An owner's ability to not renew the lease under the tenant-based voucher program does not override additional protections provided to tenants under federal, state and local law.

OC26. Does the recently announced HUD ban on evictions apply to public housing and the HCV program?

A. The [CARES Act](#) includes a temporary moratorium (120 days) on evictions for nonpayment of rent, as well as a moratorium on fees and penalties related to nonpayment of rent. HUD will issue additional guidance.

OC27. What if the state asks to house a quarantined person in a vacant public housing unit? Can the state do that if there is a waiting list?

A. For units in the public housing program (under the ACC), the PHA can only house persons that are eligible for public housing. PHAs are not able to bypass their waiting list to house new admissions requested by their state. However, PHAs may choose to amend or adjust waiting list policies to support the needs of their local community. The regulations at 24 CFR 960.206 (b)(5) include preferences for single persons who are elderly, displaced, or homeless. Additional guidance on waivers to help PHAs better respond to the coronavirus will be published soon.

OC28. Can I ban visitors from my senior high-rise?

A. PHAs have the authority to restrict visitors from public housing properties. If a PHA plans to implement a visitor ban through amended PHA policies, PIH recommends it be done as part of a broader, publicly announced plan to respond to the pandemic national emergency. PHAs should consider that residents will still need to receive essential services, such as food deliveries, medications, and personal care assistants (PCAs). For example, restrictions should track with CDC guidance and recommendations from state or local health officials. Once those policies are adopted, HUD regulations at 24 CFR 966.4(f)(4) requires tenants to abide by them.

Under the HCV program, including project-based vouchers, PHAs and owners should review the lease, state and local laws to determine the permissibility of banning visitors.

OC29. My area has a local shelter-in-place order. How can I continue any PHA operations?
(Updated)

A. PHAs are encouraged to continue operations to the extent possible during a shelter-in-place order (or other restrictions) in order to maintain decent, safe and sanitary public housing. Critical functions for the HCV program would include making HAP payments to landlords and, for public housing, ensuring that any reported exigent health and safety issues are resolved. As a reminder, there are no requirements in the regulations for face-to-face meetings with residents. Also, HUD has authorized the use of alternate means for public meetings (see OC13) and will issue guidance on waivers for deadlines.

PHAs can use alternate methods to collect information for new admissions and interim re-examinations for reduced wages or hardship exemptions. Alternate methods would include email, mail, or phone. These flexibilities are already available for third-party verifications, see the EIV guidance in [PIH Notice 2018-18](#). For example, a resident may call to report they have been laid off from a restaurant job. The PHA should attempt to verify this with the employer. If the PHA cannot obtain this verification, they can document their attempts and continue with the process to adjust the tenant payment.

OC30. Do we have discretion in deciding as to whether or not the employees continue to work? If no case of COVID-19 amongst the tenants, do we have to quarantine or do business as usual?

A. PHAs are encouraged to follow all state, local and federal guidance about social distancing, sheltering in place, etc. PHAs have discretion on deciding whether employees continue to work as long as that decision is made in compliance with Federal, State and local laws and the PHA's employment personnel policy.

4.0 Resident Health (RH)

RH1. How will my PHA learn about a positive COVID-19 case?

A. PHAs will learn about COVID-19 cases and activities in the community from their state and local health departments. PHAs should communicate with their local health department if they are concerned that residents/workers in their facility might have COVID-19. Residents can be encouraged to self-report in a broader pandemic emergency policy.

RH2. How does a public housing agency message to residents when there is a positive COVID-19 case in their building or property?

A. PHAS should follow all state and local health department guidance as well as the CDC's COVID-19 communication resources in both print and digital form at:
<https://www.cdc.gov/coronavirus/2019-ncov/communication/index.html>

RH3. How should a PHA inform residents/staff within a public housing unit that there is a positive COVID-19 case? How should a PHA share this information within their unit without breaking HIPAA/other privacy laws?

A. PHAs can create a communication plan for distributing timely and accurate information during an outbreak; this could be included in a broader pandemic emergency plan. PHAs can identify everyone in its chain of communication (for example, staff, volunteers, key community partners and stakeholders, the local HUD office and clients) and establish systems for sharing information. PHAs should maintain up-to-date contact information for everyone in the chain of communication and identify platforms appropriate for the communication need and size of the agency. For example, PHAs may use a hotline, automated text messaging, and a website to help disseminate information to those inside and outside your organization.

PHAs can provide notification of positive COVID-19 cases without giving the name/apartment number/other personally identifiable information to their residents and staff. PHAs generally are not “covered entities” as defined by HIPAA but should exercise discretion in communications to avoid stigma and mistreatment of residents.

RH4. Is there a place I can refer residents that are experiencing distress?

A. The [Disaster Distress Helpline](#), 1-800-985-5990, is a 24/7, 365-day-a-year, national hotline dedicated to providing immediate crisis counseling for people who are experiencing emotional distress related to any natural or human-caused disaster.

5.0 Eligible Use of Funds (EU)

EU1. What activities and purchases can be supported with Operating and Capital Funds for COVID-19 response? (Updated)

A. The [CARES Act](#) provides new public housing funds and permits PHAs to use existing Capital Funds and Operating Funds flexibly. In addition, PHAs will be able to use these funds for “other expenses related to preventing, preparing for, and responding to coronavirus, including activities to support or maintain the health and safety of assisted individuals and families, and activities to support education and child care for impacted families.” This flexibility is allowed until December 31, 2020. HUD will issue detailed guidance on eligible uses of the funds soon. Eligible expenses can include:

- Staff labor hours for emergency planning and response;
- Personal protective equipment (PPE);
- Cleaning supplies such as disinfectants and sanitizers;
- Contracted services for cleaning;
- Transportation of staff to perform essential functions and assist residents;
- Capital expenditures designed to improve the safety of residents such as improved ventilation systems and high-grade filters, portable air filtration equipment, and portable humidifiers;
- Necessary equipment to protect people engaged in modernization activities;
- Public health training;
- IT equipment and upgrades; and
- Sanitation equipment for common areas.

EU2. What activities and purchases can be supported with HCV Administrative Funds? (Updated)

A. The [CARES Act](#) provides new funds for administrative expenses for section 8 programs, to support or maintain the health and safety of assisted individuals and families, and costs related to retention and support of participating owners.

PHAs may use administrative fees and administrative reserves to cover HCV and PBV staff labor hours for planning and response, personal protective equipment (PPE), and cleaning supplies for the office such as disinfectants, sanitizers, etc. Additionally, administrative fees and administrative fee reserves can be used to pay for costs to transport staff to perform essential functions. Such funds can also cover costs to upgrade equipment or technology to facilitate electronic communication and reduce reliance on in-person meetings and transactions.

EU3. Will I continue to receive HUD funds if HUD staff are teleworking? (Updated)

A. Yes, HUD is fully equipped to remain operational if HUD office are closed or HUD staff are teleworking. At this point, HUD is continuing to obligate all Public Housing and HCV funds through the normal process. HUD is also on target to obligate 2020 Public Housing Capital Fund grants by mid-April; however, HUD cannot obligate those funds unless a PHA submits a signed ACC Amendment to the Field Office. Because of specific language in HUD's appropriation, the Department cannot except Capital Fund Annual Contributions Contract (ACC) Amendments with digital signatures, but it can accept scanned Capital Fund ACC Amendments with written signatures in lieu of receiving hard copy signed ACC Amendments in the mail. If not already transmitted, PHAs should send the signed Capital Fund ACC Amendments by email since HUD staff are teleworking. PHAs should **not** send Capital Fund ACC Amendments through the postal service or via expedited delivery service.

EU4. Can I pay workers that are unable to telework with HUD funds if a PHA is ordered to close by local or state officials?

A. As part of emergency planning, all PHAs should review employees and their roles, and consider which functions are essential in case of state-mandated closures or a local shelter in place requirement. This may already be part of your personnel policy or labor agreements.

The new Families First Coronavirus Response Act requires certain employers to provide employees with paid sick leave or expanded family and medical leave for specified reasons related to COVID-19. The Department of Labor's Wage and Hour Division (WHD) administers and enforces the new law's paid leave requirements. See their guidance at www.dol.gov/agencies/whd/pandemic.

EU5. My PHA will struggle to cover operating costs if there are significant drops in rent collections related to income loss by our residents. Will HUD help increase operating subsidy to cover this shortfall?

A. The [CARES Act](#) provides new funding and funding flexibilities for PHAs responding to the COVID-19 pandemic. HUD will soon publish guidance on the new provisions.

EU6. I'm trying to understand the President's mandate and it appears that if my employees don't work, I will have to pay them for 2 weeks and then deduct that amount from my quarterly FICA submission up to \$200 per day. Can we then use Capital Funds thru the Administrative section of our annual plans to be reimbursed for any additional days that we pay?

A. PHAs must follow all Federal, state and local laws as well as their established employment personnel policies. The new CARES Act provides PHAs flexibility for the Operating and Capital Funds. HUD will issue guidance soon. However, neither the PHA nor HUD can reimburse for past costs.

6.0 Relocation (R)

R1. If tenants request temporary relocation during the quarantine, what are a PHA's options for addressing the request? (Updated)

A. Residents may experience significant stress about their safety related to COVID-19 transmission and may ask for temporary relocation out of multi-unit properties. PHAs can request additional information from the resident to verify the need for relocation. PHAs are not required to grant these requests in advance of a specific health department directive. Health departments often recommend that residents self-isolate within their current home. PHAs can request verification from a medical health professional or the state or local health department as part of reviewing special requests related to COVID-19. PHAs can allow current resident families to use vacant units for temporary relocation if separation is recommended by the health department or a medical health professional.

7.0 Service Grant Administration (ROSS-FSS) (SG)

SG1. If a PHA has not established a policy for working remotely, and a Service Coordinator requests to work from home, may they?

A. A Service Coordinator should follow the human resources plan for its PHA as well as any guidance or mandate from state or local health departments.

SG2. If personnel are required by their properties, state, or local governments to work from home, can they?

A. There are no provisions in HUD supportive services grants that prohibit a Service Coordinator/Coach/Case Manager from making him/herself available remotely on an interim

basis. Personnel must follow their agency or locality's directives. In order to minimize disruption in case management, Service Coordinators may want to make their contact information available in a variety of ways:

- The PHA's home page
- The PHA's resident services page
- The PHA's Facebook and/or Twitter accounts
- An out-of-office message on your office phone with your telephone/email contact information
- An out-of-office email message with your phone number
- A resident hotline if your PHA has one
- Rent statements
- Texting/emailing clients for whom you already have contact information
- Other methods your PHA is using to communicate with residents during this time

SG3. If permissible, how can Service Coordinators continue to serve residents effectively if they are working remotely? See additional tips/best practices garnered from other sites in GA2.

A. Much of the work of a Service Coordinator can be done remotely. We encourage you to use technology such as the following, inasmuch as they are available to you and your residents:

- Phones
- Text
- Email
- Web-based and Smart Phone-based Videoconferencing