



## **Interim Guidance on COVID-19 (Coronavirus)**

SUMMARY: To minimize the health risks for building occupants, property managers should monitor guidance about COVID-19 and provide up to date information for their tenants and staff.

### **Suspended physical inspections**

At this time, the agency has suspended physical inspections of properties and units until further notice. Property Managers should contact VHFA with questions regarding compliance and asset management practices during this time. Residents should continue to contact the organization responsible for property management with any questions or concerns.

### **Short-term housing**

In an attempt to meet immediate short-term housing needs as a result of COVID-19, VHFA is aware property owners and managers are working with service providers seeking temporary shelter options for Vermonters. VHFA has received inquiries as to whether it is acceptable to use vacant units in multi-family housing properties to house those who may be displaced by COVID-19, and specifically those from over-crowded shelters.

- **Tax Credit Properties in Extended Use:** At this time, properties that were funded by the Low-Income Housing Tax Credit program and are in the extended use period (year 15-30) may use vacant units to temporarily house displaced individuals or families for the duration of the [National Emergency](#)
- **Tax Credit Properties in Initial Compliance Period:** The Internal Revenue Services (IRS) and Treasury have not issued guidance that suspend compliance requirements for Tax Credit properties that are in their initial 15 year compliance period. As such, VHFA is acknowledging that providing temporary housing in vacant units would likely trigger a 8823 for noncompliance without further guidance from the IRS.

VHFA will be advocating to the IRS and Treasury for there to be guidance issued for LIHTC properties to be as flexible as possible to meet the changing needs of Vermont communities during the COVID-19.

At the time of this issuance we remain in a National Emergency and not a Federal Disaster. At times, declarations have been accompanied by a lifting of regulatory requirements like natural disasters (hurricanes). As of this time, there is no similar lifting of regulations as a result of COVID-19.

### **Delayed Tenant Income Certifications**

In an effort to respond to questions regarding delayed Tenant Income Certifications and third party verifications due to COVID-19, VHFA suggests that you add documentation to each tenant file that states “Due to the COVID-19 pandemic, Tenant Income Certifications and verifications are delayed “. Be sure include a date and an electronic signature to this documentation.

**Good sources of accurate information include:**

- [Vermont Department of Health](#),
- The federal [Centers for Disease Control and Prevention](#) (CDC), and
- The [Institute of Real Estate Management](#) (IREM).
- [Novogradac](#)

**Best practices for property managers:**

**Inform tenants about prevention measures:**

- Property managers should take some commonsense steps to help prevent spread of the virus at their place of work and at their properties. Those steps include:
  - Wash hands regularly for at least 20 seconds using soap and water.
  - Avoid touching of eyes, nose, and mouth with hands.
  - Avoid close contact with people who are sick.
  - Stay home if you are exhibiting cold or flu-like symptoms or feel sick.
  - Cover mouth and nose with the inside of the arm or with a tissue when coughing or sneezing. Throw the tissue away immediately. Wash hands as soon as possible afterward.
- IREM has prepared fact sheet templates to inform tenants how they may help prevent the spread of infection.

**Encourage employees and residents to stay at home when sick, and travel safely**

- Ensure employees are aware of sick leave policies.
- Inform residents about ways to communicate with management (phone, e-mail, mail) instead of office visits.
- Evaluate need for travel and provide safe travel information, such as the CDC's Travelers Health Notices.

**Perform additional cleaning of office work-spaces and public access areas**

- Ensure repeatedly touched surfaces in the workplace, such as workstations, counter- tops and doorknobs are cleaned thoroughly and frequently.
- Provide employees with cleaning products and encourage routine cleaning. See the CDC's guidance on effective cleaning and disinfecting products.

- Make sure soap and hand sanitizer are available in rest rooms, kitchen and other high traffic areas.
- Consider increasing outside air intake to the building to promote higher amounts of fresh air, or other similar measures as appropriate for property HVAC systems.

#### **Plan for emergency or alternative office operations**

- Prepare a continuity/emergency operations plan for your business if you don't already have one in place. Make sure employees have reviewed and understand the plan.
- Prepare to conduct some in-person transactions (such as lease renewals, recertifications, rent payments, work orders) by phone, e-mail, or other alternative methods.

#### **Use screening questions to determine if planned appointments should be rescheduled**

- If residents or staff answer yes to any of the following questions prior to an in-person meeting or in-unit non-emergency maintenance request, reschedule the appointment (or attempt to conduct in an alternative way)
  - I have traveled to an area where COVID-19 is spreading within the past 14 days.
  - I have been in close contact with people who have traveled to areas where COVID-19 is spreading within the past 14 days.
  - I have been around people who are sick with colds or flu.
  - I have symptoms of a cold.
  - I have a fever or have had a fever within the past week.
  - I have been nauseated or have vomited or had diarrhea within the past week.
- VHFA staff may use these same screening questions in order to determine whether to reschedule on-site visits, inspections or reviews in upcoming weeks.
- VHFA will postpone inspections or site visits for properties with active cases, or as recommended by public health officials.

#### **Who to call?**

- If you have questions about COVID-19: Dial 2-1-1
- If you are returning from China, Italy, Iran, South Korea or Japan: Call Health Department Epidemiology at 802-863-7240
- If you are ill, have symptoms, or concerned about your health: Call your health care provider