



**GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT**



Portfolio and Asset Management Division



HOME Program

August 11, 2020

Dear Affordable Housing Professionals:

The Department of Housing and Community Development (DHCD) greatly appreciates your ongoing efforts to provide affordable housing to an increasingly vulnerable population, particularly during the COVID-19 public health crisis. Please refer to the information below for agency guidance regarding monitoring and the use of electronic signatures for properties under the purview of DHCD.

On-site Monitoring: Federal Guidance

Under HOME-assisted Rental Housing Citation: 24 CFR 92.504(d)(1)(ii) and 24 CFR 92.64(a), DHCD is not required to conduct compliance-monitoring inspections or tenant file reviews during the period beginning April 1, 2020 and ending on December 31, 2020. Within 120 days of the end of this waiver period, DHCD will physically inspect units that would have been subject to on-going inspections during the waiver period. The waiver is applicable to on-site reviews to determine a HOME rental project's compliance with rent and income requirements, if the owner is unable to make documentation available electronically. The waiver terminates on December 31, 2020.

On-site Monitoring: DHCD Advisory

DHCD will resume compliance-monitoring inspections and tenant file reviews effective January 1, 2021. If your property was scheduled for a compliance-monitoring review in FY2020, the review will be suspended until January 1, 2021. If your property is scheduled for a compliance-monitoring review in FY2021, the review will take place as scheduled.

DHCD is working with the District Office of Risk Management to ensure safe and appropriate measures will occur, consistent with the latest health guidelines, when on-site visits do resume; look for further correspondence from the agency toward the end of calendar year 2020.

Use of Electronic Signatures and other Monitoring Guidance for Affordable Housing Programs:

The Department of Housing and Urban Development's Office of Multifamily Housing Programs has provided guidance for COVID-19-related relief procedures for property managers, owners, agents, lenders and their partners of residential rental properties financed with HOME Investment Partnerships Program (HOME)

The HOME Program Covid-19 waiver period is valid from April 1, 2020, through December 31, 2020. The following guidance is available for all stakeholders during this period:

Use of Tenant Self-Certifications for Annual Recertifications

HUD will allow assisted tenants that have lost income due to Covid-19 to self-certify for annual recertifications. Acceptable methods of verification of income for all recertifications, in order of acceptability, are provided in HUD Handbook 4350.3, paragraph 5-13, B and Appendix 3. Owners must document the tenant file to explain why third-party verification was not available. During Covid-19 National Emergency, the owner can accept documents through the mail and email. The owner may consider collecting the original documents from the tenant household at a later date.

Documentation for Recertifications

Tenants experiencing extenuating circumstances due to the Covid-19 virus can provide the owner with documentation for the recertification by email or other electronic delivery at the owner's discretion. If electronic documentation is received by the owner, and original documents are required by the HUD Handbook 4350.3, the owner must collect the original documents from the tenant at a later date.

Applications, Vacancies, and Move-Ins

DHCD understands that in-person interviews are essential during the application process and it allows the owner to verify the identity of the applicant, and the need for social distancing makes this requirement problematic in the face of Covid-19. Owners and agents may choose to conduct the interviews remotely using available technology or barriers, as may be recommended by the CDC to prevent transmission of the virus. Owners may accept electronic signatures on owner-adopted verification forms in order to perform owner-adopted and HUD-required screening criteria as long as they obtain original, "wet" signatures on the verification forms at a later date.

Signatures

For owners or tenants impacted by the Covid-19 virus, HUD will allow alternate signatures (e.g. copies or images of signatures sent by email, fax, or other electronic means) as long as original, "wet" signatures are obtained at a later date including but not limited to, HUD Form 9887/9887A (Applicant's /Tenant's Consent to the Release of Information), lease agreements/addendums, and income documents such as, unemployment, zero income, etc. When a tenant's "wet" signature cannot be obtained on HUD form 9887/9887A, due to extenuating circumstances, the owner should document the tenant file with the reason for the delay and the specific plans to obtain the signature after the Covid-19 National Emergency. The HUD form 9887/9887A remains in effect for fifteen (15) months after signature.

E-signatures and Monitoring: DHCD Advisory

During the Covid-19 pandemic, DHCD will grant our affordable housing partners to accept electronic signatures for program monitoring purposes, consistent with the guidance above.

If you have any questions, please feel free to send your questions to our compliance mailbox at pamd.compliance@dc.gov.

We thank you in advance for your participation in our housing programs. DHCD's vision is creating and preserving affordable housing in the District of Columbia.

Sincerely,



Genee Hayes
Manager, Portfolio and Asset Management Division