**Analysis of the U.S. Department of Housing and Urban Development’s**

**COVID-19 Resources and Recommendations**

**Columbia Law School Health Justice Advocacy Clinic**

**March 18, 2020**

| **Link/Title** | **Description** | **Level of Original Content** | **Emergency Action Taken** | **Recommendations for Additional Emergency Action** |
| --- | --- | --- | --- | --- |
| [COVID-19 (“Coronavirus”) Information and Resources](https://www.hud.gov/coronavirus) | Main page describes the general state of the pandemic including:1. Basic precautions
2. Link to the CDC
 | No original content. This is a CDC resource. | N/A | HUD should not simply refer people to the CDC’s general resources, but should synthesize them and consolidate that information to make it relevant for HUD stakeholders. This information should be available in Spanish as well as any other languages HUD routinely translates documentation in. Visuals may also alleviate the burden of additional translations. |
| [What you need to know about coronavirus disease 2019 (COVID-19)](https://www.cdc.gov/coronavirus/2019-ncov/downloads/2019-ncov-factsheet.pdf) | CDC FAQ page with information that would be useful to the general public, but is not specifically geared towards anything HUD related. | No original content. This is a CDC resource. | N/A | HUD should produce a customized HUD document for what owners, tenants, and other relevant parties need to know about COVID-19. This document should emphasize protective measures for owners and renters regarding elderly residents and those with chronic illnesses who are particularly susceptible to COVID-19 and who are disproportionately represented in HUD housing. It should provide guidance on what younger residents can do to keep older/chronically ill residents safe, and what resources can be provided to elderly residents to lessen exposure (such as grocery shopping, pharmaceutical delivery). This could be in the form of an elderly assistance program where volunteers can perform the above-mentioned services. |
| [What to do if you are sick](https://www.cdc.gov/coronavirus/2019-ncov/downloads/what-you-should-do.pdf) | Another CDC FAQ page if someone has come down with relevant symptoms. | No original content. This is a CDC resource. | N/A | HUD should produce a customized HUD document for what owners or HUD administrators should do if an owner or tenant falls ill. |
| [Stop the spread of germs – help prevent the spread of respiratory viruses like COVID-19](https://www.cdc.gov/coronavirus/2019-ncov/downloads/stop-the-spread-of-germs.pdf) | Basic CDC infographic regarding basic precautions. | No original content. This is a CDC resource. | N/A | HUD should produce a customized HUD document for how owners and HUD administrators can prevent the spread of respiratory viruses like COVID-19.In particular, HUD should provide guidance to single family homes who may be providing care to elderly relatives or children without assistance from a partner or family unit. |
| [Message from the Secretary](https://www.hud.gov/sites/dfiles/Main/documents/secretary_message_coronavirus2.pdf) | Covers roughly the same type of information as the first 4 documents, but also explains that Secretary Carson has been lending his medical skills to the administration’s Coronavirus Task Force. | No original content. Links only to CDC resources. | N/A | HUD could release a document outlining what Secretary Carson is doing for HUD programs rather than the COVID-19 Task Force.Additional resources are needed to explain how COVID-19 prognoses are worsened by exposure to environmental hazards such as mold, lead, or carbon monoxide, and what resources owners/renters have access to for reporting conditions for emergency inspections/maintenance. Finally, HUD should provide resources (online access potentially) for exercise and wellness for residents who are quarantined or sheltering in place. <https://www.hhs.gov/fitness/resource-center/physical-activity-resources/index.html> |
| Message from Public and Indian Housing | Basic PSA to Public Housing Authorities linking to the first four documents. | No original content. Links only to CDC resources. | N/A | HUD should produce a customized HUD document explaining specific guidance to Public and Indian Housing Authorities. |
| [Guidance for Special Needs Populations](https://www.hudexchange.info/homelessness-assistance/diseases/%22%20%5Cl%20%22covid-19-community-planning-and-preparedness) | Guidance for homeless populations dealing with infectious diseases including COVID-19. Acknowledgement that HUD has consulted subject matter experts to assess how to handle the homeless population during this crisis. Links to several documents:1. [Interim guidance for homeless service providers to plan and respond to coronavirus disease 2019 (COVID-19)](https://files.hudexchange.info/resources/documents/Interim-Guidance-for-Homeless-Service-Providers-to-Plan-and-Respond-to-COVID-19.pdf)
2. [Infectious Disease Preparedness for Homeless Assistance Providers and Their Partners](https://www.hudexchange.info/trainings/courses/infectious-disease-preparedness-for-homeless-assistance-providers-and-their-partners/) (webinar)
3. [Infectious Disease Toolkit for Continuums of Care: Preventing & Managing the Spread of Infectious Disease for People Experiencing Homelessness](https://files.hudexchange.info/resources/documents/Infectious-Disease-Toolkit-for-CoCs-Preventing-and-Managing-the-Spread-of-Infectious-Disease-for-People-Experiencing-Homelessness.pdf)
4. [Infectious Disease Toolkit for Continuums of Care: Preventing & Managing the Spread of Infectious Disease Within Shelters](https://files.hudexchange.info/resources/documents/Infectious-Disease-Toolkit-for-CoCs-Preventing-and-Managing-the-Spread-of-Infectious-Disease-within-Shelters.pdf)
5. [Infectious Disease Toolkit for Continuums of Care: Preventing & Managing the Spread of Infectious Disease within Encampments](https://files.hudexchange.info/resources/documents/Infectious-Disease-Toolkit-for-CoCs-Preventing-and-Managing-the-Spread-of-Infectious-Disease-within-Encampments.pdf)
6. Additional links to questions to assist CoCs and Public Health Authorities
7. Using CoC Program Funds for Infectious Disease Preparedness and Response
8. Eligible ESG Costs for Infectious Disease Preparedness
9. COVID-19 Client Triage Tool: Atlanta, GA CoC Example
10. Specific Considerations for Public Health Authorities to Limit Infection Risk Among People Experiencing Homelessness (novel)
11. Access National Healthcare for the Homeless Council’s Resources on Influenza
12. National Network to End Domestic Violence (NNEDV) - Resources on the Response to the Coronavirus (COVID-19)
13. TechSafety.org Resources (webpages; no publication date)
14. COVID-19 News & Announcements
15. Other Disease Risks Resources
 | 1. No original content. Taken from the CDC.2. No original content. Slides are from the organizations of participating panel members.3. Documents 3-5 were prepared for HUD by the Cloudburst group. While the resource is new, the content was largely provided by the National Health Care for the Homeless Council & Public Health for Seattle & King County.6. Information prepared by HUD. Existing resources.7. Information prepared by HUD. Existing resources.8. Information prepared by HUD. Existing resources.9. Screening tool developed by Atlanta Continuum of Care10. Information prepared by HUD.11. External link12. External link13. External Link14. Internal15. External Link | None | These documents focus mainly on homeless populations, but not on other special needs populations under HUD’s purview. There should be preparedness, mitigation, and response documents prepared for the elderly, immunocompromised residents, residents with respiratory conditions like asthma and bronchitis.Additionally, HUD should direct funding to shelters to provide personal protective equipment and to provide additional human resources in the case of employee absences.6. This document poses only questions but does not provide any relevant answers. An FAQ sheet would be more instructive.9. HUD should use Atlanta’s CoC screening tool to develop a mobile platform that can be distributed to all relevant stakeholders.10. HUD should issue a directive rather than outreach worker considerations to provide widespread relief.12. HUD should issue guidance to PHAs should there be an increase in domestic violence, as is predicted currently.13. HUD should provide technical capacity to under-resourced PHAs, especially in over-burdened urban populations and rural areas, rather than recommendations. |
| [Healthcare Programs Section 232 242 Guidance for Stakeholders](https://www.hud.gov/sites/dfiles/Main/documents/Healthcare-Programs-Section%20232%20242-Guidance-Stakeholders-March2020.pdf) | General notice that Secretary Carson was appointed to the COVID-19 task force. | N/A | None | This is an opportunity for HUD to issue guidance and define who stakeholders are in this context. |
| [Loss Mitigation Guidance for Single Family Stakeholders](https://www.hud.gov/sites/dfiles/Main/documents/LossMitigation-Guidance-Single-Family-Stakeholders-March2019.pdf) | General notification that the FHA provides loss mitigation options if borrowers become distressed in times of economic crisis such as this pandemic. | Content prepared by HUD but there is no new content or directives. | None | This is an opportunity to HUD to offer monthly mortgage payment relief and to provide specific resources for their loss mitigation programs. |
| [Single Family Housing Guidance for Stakeholders](https://www.hud.gov/sites/dfiles/Main/documents/SingleFamily-Housing-Guidance-Stakeholders-March2020.pdf) | General links to resources 1-4 for concerned stakeholders. | N/A | None | Like the resources above, HUD can make this more tailored to single family homes and what specific guidance they will need, rather than referrals to the CDC. |
| [Housing Counseling Guidance for HUD-Approved Housing Counseling Agencies](https://www.hud.gov/sites/dfiles/Main/documents/Housing-Counseling-Guidance-for-HUD-Approved-Hsg-Counseling-Agencies_March2020.pdf) | General links to resources 1-4. | N/A | None | HUD should provide specific directives for Housing Counseling Agencies. |
| [Message from the Office of Multifamily Housing](https://www.hud.gov/sites/dfiles/Main/documents/MultifamilyHousing-Guidance-Stakeholders-March2020.pdf) | General links to resources 1-4. | N/A | None | HUD should provide specific directives for Multifamily Housing owners and tenants. |
| [Office of Manufactured Housing Guidance for Stakeholders](http://tured-housing-guidance-stakeholders-march2020.pdf) | General links to resources 1-4. | N/A | None | HUD should provide specific directives for manufactured housing providers and tenants.  |
| [Q&A for Office of Multifamily Housing Stakeholders: Coronavirus (COVID-19)](https://www.hud.gov/sites/dfiles/Housing/documents/MF_Corona_QA_FINAL_3-12-20.pdf) | Extensive FAQ for Multifamily Housing Stakeholders. However, the only preparedness steps that are offered are based on CDC guidelines. For example, the document directs: “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.” There are many excellent questions, and the answer is consistently: follow CDC guidelines, without providing explicit advice.It does provide more information on funding:* No additional funding will be provided to HCV or section 8 families to lessen the impact. It encourages owners to work with families.
* Emergency funds that owners can access for outbreak preparedness and response: property operating accounts for supplies, staff hours, and overtime with no advanced HUD approval.
* HUD approval if owner expects repayment before annual distribution of surplus cash.
* Until further notice, Multifamily is postponing all REAC property inspections and Management and Occupancy Reviews for all Multifamily properties.
 | HUD prepared this document with basic preparedness guidelines from the CDC. | Non-emergency REAC inspections are suspended until further notice.Regulatory waivers will be considered on a case by case basis.All audited statements are provided with a 30 day extension.All meetings that cannot be held in person will be held via conference call.Multifamily field office and HQ staff will process subsidy contracts remotely.REAC will extend capital needs inspection milestones/deadlines case by case.HUD will conduct RAD closings remotely.Sampling requirements may be waived for third-party inspectors in favor of vacant or model apartments.If a lender cannot verify the inspection report’s findings, they will need to inspect prior to issuing the insurance commitment. FHA site inspections will be waived on a case by case basisLease audits can be performed electronicallyLoan closings can be conducted by mail or electronicallyMonthly draws, trip reports, and change orders require at least the presence of the construction inspector, but if they cannot be present, the draw will be postponed.Cost certification and final endorsement will be conducted electronically. | HUD should direct multifamily housing administrators to immediately suspend evictions and waive rent payments. HUD has already [suspended foreclosures and evictions in single-family](https://www.hud.gov/sites/dfiles/OCHCO/documents/20-04hsgml.pdf) homes with FHA-insured mortgages and should do so in multifamily properties with FHA-insured mortgages as well.  |
| [Q&A on Human Resources Flexibilities and Authorities for Coronavirus Disease 2019 (COVID-19)](https://www.hud.gov/sites/dfiles/Main/documents/COVID-19-GuidanceQA33-7-2020.pdf) | Internal information for HUD employees on how to conduct their business during the COVID-19 crisis although much of it appears to have been adapted from guidance regarding past infectious diseases.  | Repurposes existing information about sick leave and telework policies to apply to COVID-19 pandemic. | None | HUD should provide directives that all employees who are able to telework should shelter in place in their homes (rather than just employees who are covered by the telework program). Agencies that normally bar work from home when there are small children at home should be directed to modify their policies and provide either paid leave or offer privacy alternatives. The current policy is to provide paid or unpaid leave.HUD should also modify its policy regarding employees requesting advanced sick leave to reflect the incubation period for COVID-19.HUD’s current advice to employees requesting advanced sick leave is: “104 hours (13 days) may be advanced if the employee is providing care for a family member who would jeopardize the health of others by his or her presence in the community because of exposure to a quarantinable communicable disease.” However, the incubation period for COVID-19 is 14 days according to CDC guidelines.  |
| [Quick Guide to CDBG Eligible Activities to Support Infectious Disease Response](https://files.hudexchange.info/resources/documents/Quick-Guide-CDBG-Infectious-Disease-Response.pdf?utm_source=HUD+Exchange+Mailing+List&utm_campaign=b8690951ad-CDBG-Quick-Guide-COVID19_3%2F13%2F20&utm_medium=email&utm_term=0_f32b935a5f-b8690951ad-19454153) | Provides information on building costs related to COVID-19 that could be covered by Community Development Block Grants (CDBG). Such costs include:* Build a testing/diagnosis/ treatment facility
* Rehabilitation of community facility
* Build a centralized group living facility
* Rehabilitation of commercial building/closed school to repurpose for treatment of infectious diseases
* Hotel/motel refurbishing for treatment
* Improvements to private property to facilitate quarantine
* Grants/loans to businesses to create jobs/manufacture medical supplies
* Avoid job loss by providing short-term capital assistance to small businesses.
* Provide financial relief to microenterprises that provide essential services during a pandemic.
* Provision of new or increased public services
* Planning grants
* Grants for hiring of technical assistance providers
* Data gathering, studies, analysis, response plans for infectious diseases.
 | Repurposes information about CDBGs as it may relate to COVID-19. | None | HUD should provide detailed instructions on how to apply or a link to instructions on the CDBG website. |
| [Q&A for Office of Healthcare Programs External Stakeholders: Coronavirus (COVID-19)](https://www.hud.gov/sites/dfiles/Main/documents/OHP_Corona_QandA.pdf) | FAQ referring most questions to the CDC. | Most answers were to review CDC guidance. | HUD is suspending all REAC inspections | HUD should provide specific information from the Office of Healthcare Programs rather than referring to CDC instructions for very possible scenarios in which a resident becomes infected.HUD should also provide guidance for residents whose chronic health conditions including respiratory conditions may be exacerbated by sheltering in place in a unit with environmental hazards like mold. To protect these residents, HUD should allow for emergency inspections and corrections to deal with hazardous living conditions. |
| [Q&A for Office of Single Family Housing: COVID-19 Questions and Answers](https://www.hud.gov/sites/dfiles/SFH/documents/SFH_COVID_19_QA_03_13_20.pdf) | FAQ about general FHA activities. | Mainly repurposed information although some modifications were made for COVID-19. | Credit checks are not suspended but poor credit should be considered in the economic context of COVID-19.FHA single family in-person trainings are suspended through March 2020.Audited financial statements are not due until April 30, 2020. |  |
| [Continuation of FHA Single Family Business Operations Related to COVID-19 / Temporary Partial Waiver of Servicing Requirements Regarding Face-to-Face Contact with Borrowers](https://www.hud.gov/sites/dfiles/SFH/documents/fha_info20-20.pdf) | FHA information regarding waivers to avoid face-to-face encounters with borrowers. | This is an announcement, rather than a guidance document. | Temporary Partial Waiver of Servicing Requirements Regarding Face-to-Face Contact with Borrowers |  |
| [Letter from the Office of Public and Indian Housing and the Office of Multifamily Housing](https://www.hud.gov/sites/dfiles/PIH/documents/pihmultifamilycovidfinal.pdf) | General status updates. | This is a letter rather than a guidance document. | REAC inspections are suspended.  |  |
| [COVID-19 FAQs for the Public Housing, Housing Choice Voucher (HCV) (including the Project-based Voucher Program (PBV)) and Native American Programs](https://www.hud.gov/sites/dfiles/PIH/documents/COVID19_FAQ_PIH_Final.pdf) | The same FAQs as above but for Public Housing, Housing Choice Voucher and Native American Programs. | Yes |  | HUD should direct to PHAs to issue a moratorium on evictions, and to waive minimum rent payments under “other circumstances determined by the responsible entity or HUD.” 24 C.F.R. 5.630. HUD should provide emergency financial support to PHAs who draw from operating budgets or capital funds.  |

Additional Recommendations for the U.S. Department of Housing and Urban Development:

* Direct states and private banks to put a moratorium on all evictions immediately and freeze evictions in all federally-assisted housing. Fannie Mae and Freddie Mac have suspended foreclosures and evictions for at least 60 days for families with an Enterprise-backed single-family mortgage. This was an excellent step and we urge HUD to expand its announcement that FHA-insured single family mortgages are not subject to evictions or foreclosures for 60 days by securing authority from Congress, as Secretary Carson announced the Department has sought, to allow HUD to suspend evictions in Public Housing.
* Provide emergency funds for rent abatement in the event of immediate income loss faced by tenants due to COVID-19.
* Address poor housing conditions that could threaten the health of residents while sheltering in place, even though REAC inspections are temporarily suspended.
* Release funding for PHAs who may lose the tenant portion from their HAP contracts due to widespread job losses to provide basic services including sanitization of housing units, utilities, and repairs.
* Extend deadlines for finding housing with section 8 vouchers and exception rents. Housing Choice Voucher search terms should be automatically extended for all current Voucher holders who have not yet entered into a lease, and should be restarted after the COVID-19 pandemic emergency period.
* Protect tenants who are in the process of porting and cannot port as the Housing Authorities are closed.
* Protect tenants whose move-ins are pending but PHAs are not able to inspect their units.
* Provide for remote contract signing for tenants who have paid deposits but cannot sign their contract in person as PHA staff are teleworking.
* Provide minimum rent waivers for Public Housing tenants.
* Issue guidance to ensure that PHAs and owners have procedures in place to process urgent requests such as emergency transfers for survivors of domestic violence, dating violence, sexual assault, and stalking during the pandemic.
* Provide guidance to PHAs that rent will decrease due to loss of income related to COVID-19. This decrease should be retroactive regardless of when the tenant was able to report it considering the limitations on in-person reporting.
* Extend voucher terms in circumstances where tenants are delayed in finding new lodging due to the COVID-19 crisis.
* Provide guidance to PHAs and third party contractors to offer liberal repayment arrangements in lieu of termination where rent delinquency due to COVID-19 is occurring.
* Provide guidance to PHAs that they can consider mitigating circumstances (effects of COVID-19) when tenants are evicted.
* Waive any HUD regulations that PHAs or other entities request be waived in order to facilitate their tenant-centric responses to COVID-19.