

COVID-19 FAQs for the Public Housing, Housing Choice Voucher (HCV) (including the Project-based Voucher Program (PBV)) and Native American Programs

Emergency Preparedness

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

A. PHAs, Tribes and TDHEs should stay in touch with their assigned field representatives. PIH has also established a dedicated email address for questions at PIH-COVID@hud.gov.

Q. Is there funding for PHAs to create emergency plans?

A. Currently, there is no new or dedicated funding to create emergency plans for the COVID-19 virus. For PHAs operating public housing, the time for staff to prepare plans should be considered an operating expense. For PHAs operating the HCV program, the time for staff can be considered an administrative expense.

Q. How should my PHA, Tribe or TDHA prepare for coronavirus infections among our assisted families?

A. While there is no formal planning requirement, HUD recommends that housing providers and PHAs that administer voucher assistance consider the potential impacts that may occur if a resident contracts coronavirus or there is a local quarantine directive. HUD recommends that PHAs, Tribes and TDHEs follow U.S. Centers for Disease Control and Prevention (CDC) guidance for homes and for communities, businesses and schools posted at www.cdc.gov/coronavirus/2019-ncov/.

Some topics to consider in your plan include:

- Managing short and long-term quarantines in a unit or a property
- Preparing Staff
 - Use of remote working
 - Availability of personal protective equipment (PPE) and cleaning products
 - Communication with union(s)
 - Providing access to health care providers and/or police
 - Guidance from CDC and OSHA
- Resident Communication
 - Working with resident groups
 - Changes to standard communication methods
 - Providing access to health care providers and/or police if requested
 - Guidance from CDC and state, local health departments
 - Encouraging residents to self-report quarantines
- Resident Services

- Considering implementing 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 that may be requested
- Modifying Regular Processes if Advised
 - Unit inspections
 - Rent Collection
 - Recertifications
 - Public meetings
- Additional Considerations for PHA/TDHE 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., ACOP and HCV Administrative Plan)

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

A. The following websites provide useful information for PHAs, Tribes, and TDHEs 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 PPE. Additional information on disinfectants is also available at www.epa.gov/coronavirus;
- Guidance for workers and PPE is also at www.osha.gov/SLTC/covid-19/.

Q. What are HUD’s PHA procurement policies to meet response needs during this time (e.g. specialized cleaning)?

A. 2 CFR § 200.320 permits a PHA, Tribe, or TDHE to procure from single source through noncompetitive proposals. A PHA, Tribe, or TDHE can use single source when award is infeasible under small purchase, sealed bids or competitive proposals and an item is available only from single source or public exigency or emergency for the requirement will not permit a delay from competitive solicitation. PHAs, Tribes, and TDHEs must maintain in their files, however, 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.

Operational Concerns

Q. Will REAC suspend unit inspections in properties subject to a quarantine?

A. Until further notice, REAC is postponing all 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.

Q. Our PHA, Tribe or TDHE 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, and submission of PHA Plans, Indian Housing Plans/Annual Performance Reports, and other required documents. Can HUD grant any relief on these regulatory requirements?

A. As part of planning efforts related to COVID-19, HUD encourages agencies to evaluate which functions can be done remotely if the PHA office closes or staff are quarantined. PHA plan submission deadlines and annual recertifications are mandated under statute and cannot be waived. However, HUD recognizes that local circumstances may impact an agency's ability to comply with certain requirements, including deadlines. As such, and in an abundance of caution, HUD encourages PHAs to prioritize efforts to reduce or mitigate the risk of infection.

The Assistant Secretary of Public and Indian Housing can consider regulatory waivers for PHAs, Tribes and TDHEs significantly impacted by COVID-19 response. During this time, waivers will follow the regular process. All PHA-related waiver requests should be sent in accordance with PIH Notice 2018-16.

Q. If a PHA finds it necessary to close for a period of time, would HUD allow waivers to meet certain deadlines such as recertifications, HQS inspections, extensions on vouchers, lease up?

A. Waivers are not needed for voucher extensions and lease up. With respect to HQS inspections, HUD encourages PHAs to use existing inspection flexibilities. If they have not already, PHAs should consider adopting biennial inspections (Notice PIH 2016-05: Attachment K: Biennial inspections and the use of alternative inspection methods and inspection timeframes). Under this notice, a PHA that moves to biennial inspections for all of the units in its portfolio does not need to update its Admin Plan to reflect the change. However, if for any reason, this change would require an update to a PHA's Admin Plan, HUD will consider waiving the requirement for the Admin Plan changes to be formally adopted by the board in order to become effective (24 CFR § 982.54 (a)). For a full list of PHA flexibilities involving HQS inspections please refer to PIH Notice 2017-20.

Q. Is there any guidance on how to deal with rent assisted (Housing Choice Voucher (including Project-Based Voucher), public housing and IHBG) 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?

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.

Tribes and TDHEs administering the IHBG program are encouraged to use their discretion and best judgment to provide relief to any residents who cannot meet their rent obligations under these circumstances.

Q. 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?

A. Yes, a PHA may apply for an extension to the obligation end date of its Capital Fund grants, as long as the request is received prior to the obligation end date. In most cases, the obligation extension justification related to COVID-19 would be pursuant to 24 CFR 905.306(d)(5), "An event beyond the control of the PHA."

Q. Reporting requirements - can 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.

Q. 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, income certification, and work or inspections in units?

A. PHAs, Tribes and TDHEs should plan now for alternative procedures for these processes, as they may become restricted during a quarantine. Options may include electronic transmission of funds, online teleconference calls, or secure collection boxes for payments. As part of planning, follow CDC guidance to avoid virus transmission and to provide personal protective equipment (PPE) sufficient for the service performed. For more information, see CDC's guidance on 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.**

Q. How do you conduct a public meeting that is required by HUD if the public may not be allowed to attend?

A. Public meetings required as part of the annual planning process must still occur during a quarantine. If there is an active quarantine 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. As of the date of this posting, CDC recommends that workplaces use videoconferencing for meetings when possible. When not possible, hold meetings in open, well-ventilated spaces.

Q. Will previously scheduled ONAP monitoring, technical assistance or training sessions be impacted by COVID-19?

A. It depends. Please contact your area ONAP Office to get the latest updates.

Q. Given that HUD staff in Field Offices (and Headquarters) may shift to teleworking, what is the best way to communicate with HUD?

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 except Capital Fund 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.

Eligible Use of Funds

Q. What activities and purchases can be supported with Operating Funds?

A. Operating Funds can be used to cover staff labor hours for planning and response, personal protective equipment (PPE), and cleaning supplies such as disinfectants, sanitizers, etc. If a PHA chooses to contract out specialized cleaning services, operating subsidy can be used. Additionally, Operating Funds may be used for costs to transport staff to perform essential functions.

Small PHAs (fewer than 250 public housing units) may use operating funds as described above, or to pay for activities listed in the question related to eligible uses of capital funds as described below.

Q. What activities and purchases can be supported with Capital Funds?

A. PHAs may use Capital Funds to cover costs of 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.

Capital Funds may be used to pay for necessary equipment to protect people engaged in modernization activities (e.g. PPE for workers involved in construction). In addition, they can be used to pay for transportation costs of people engaged in modernization activity if transportation is disrupted by COVID-19 (e.g. because public transit is suspended).

PHAs may also use Capital Funds as Management Improvements to cover costs such as emergency planning, public health training, IT equipment and upgrades to allow for remote public meetings or telework by PHA staff, and sanitation equipment for common areas.

In accordance with 2424 CFR 905.314(l), all PHAs may transfer up to 25% of a Capital Fund grant to Budget Line Item (BLI) 1406 to be used for costs that are eligible under the Operating Fund Program. PHAs with fewer than 250 units, that are not designated as troubled, and have no significant modernization needs or debt service payments may transfer up to 100% of a Capital Fund grant to BLI 1406 to fund items eligible under the Operating Fund Program.

PHAs may use Capital Funds to cover these activities even if they are not in an approved 5-Year Action Plan as stated in 24 CFR 905.200(b)(18). However, PHAs will need to update affected 5-Year Action Plans and corresponding Annual Statements/Budgets within a reasonable period of time.

Q. What activities and purchases can be supported with HCV Administrative Funds?

A. 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.

Q. What activities can be supported with Indian Housing Block Grant (IHBG) funds?

A. IHBG formula funds can be used to pay for the cost of a wide range of eligible activities and administrative and planning costs to protect the health and safety of families assisted under the program, Tribal or TDHE housing staff. This includes, but is not limited to, using IHBG funds to pay for:

- Staff salaries and expenses for planning and response
- Purchasing personal protective equipment (PPE) necessary for TDHE staff to administer the IHBG program
- Purchase and use of cleaning supplies such as disinfectants, sanitizers, waste disposal supplies, and other supplies to disinfect homes of residents, common areas, and housing related public facilities and other public spaces like playgrounds

- Purchase and use of supplies and materials to promote the safety of residents and Tribal housing staff including gloves, surgical masks and goggles, hand hygiene products, soap, paper towels, hand sanitizer, hand wipes, and tissues, thermometers, and more.
- Transportation costs of staff to perform IHBG program functions
- Costs to upgrade equipment or technology to facilitate electronic communication and reduce reliance on in-person meetings and transactions. These costs are administrative expenses subject to the administrative cap in 24 CFR 1000.238.
- Temporary relocation assistance to families impacted by COVID-19, or to prevent exposure or spread of the virus
- Rehabilitation of housing to improve ventilation
- Housing services to educate residents on prevention and remediation measures to limit risks associated with COVID-19, and other related public health education initiatives
- Costs of establishing and operating facilities, such as isolation centers, to house persons with COVID-19 if they are unable to isolate on their own. Such facilities may include homeless persons or those that could possibly infect vulnerable populations, such as the elderly or those with existing medical conditions who are at high-risk.

Q. Can a Tribe or TDHE submit a Model Activity approval request to HUD to help address COVID-19?

A. Yes. Tribes and TDHEs that seek to carry out certain activities that are designed to help address the impact of COVID-19 in Tribal communities, and not otherwise expressly listed as eligible activities under Section 202 of NAHASDA, may submit a model activities approval request to the Office of Native American Programs (ONAP). If ONAP determines that such requests are designed to carry out the purposes of NAHASDA, ONAP will approve such requests. HUD encourages Tribes and TDHEs to develop creative ways to use their formula IHBG funds to help protect residents and Tribal communities from COVID-19.

Q. What activities can be supported with Indian Community Development Block Grant funds?

A. Like the IHBG program, a wide range of eligible activities may be carried out under the ICDBG program including health-related public facilities and public services. Generally, Single Purpose ICDBG grants that were previously awarded were awarded for specific projects. However, HUD will consider any program amendments submitted by Tribes in accordance with 24 CFR 1003.305 to help address the impact of COVID-19. All program amendment requests must meet the criteria in 24 CFR 1003.305 to be approved by HUD. Additionally, ICDBG Imminent Threat grants may be available to Tribes depending on the urgency and immediacy of the threat posed to the public health or safety of tribal residents. Both program amendments and Imminent Threat grants must be ICDBG eligible activities.

Q. What options are available to Section 184 borrowers negatively impacted by COVID-19?

A. Borrowers are reminded to connect with their Section 184 lenders and servicers to explore loss mitigation options to help prevent them from going into foreclosure.

Relocation

Q. If there is a need to do specialized cleaning or disinfection in a public housing unit or building as part of response, can operating funds be used for the cleaning? How about capital funds?

A. PHAs may be asked by the health department to assist in response to COVID-19. If the PHA needs to perform specialized cleaning of a unit and temporary relocation of that family to another unit while it is performed, HUD considers the cleaning and temporary relocation of that family an operating expense, therefore they may use operating funds. If there is a need to do a larger scale cleaning of multiple units and common areas, HUD considers the cleaning of multiple units and temporary relocation of multiple families a capital expense, therefore they may use their capital funds for the cleaning services and for temporary relocation of families.

If residents request specialized services in the absence of a specific health department recommendation, PHAs can request additional information from the resident as verification. Verification could include written communication from a medical health professional or the state or local health department. PHAs may use electronic and telephonic communication to perform verification.

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

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. 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.