

AFFORDABLE HOUSING CONNECTIONS

APRIL 13, 2020 – COVID-19 UPDATE

1. IS AHC CONDUCTING PHYSICAL INSPECTIONS AND FILE REVIEWS AT THIS TIME?

PHYSICAL INSPECTIONS AND FILE REVIEWS HAVE BEEN POSTPONED UNTIL AT LEAST THE END OF APRIL AT WHICH TIME WE WILL REVIEW AND ADJUST OUR PROCEDURES IF AND AS NEEDED.

IF YOU HAVE ANY QUESTIONS REGARDING YOUR SPECIFIC SITES, PLEASE CONTACT YOUR PORTFOLIO LEAD FOR MORE INFORMATION. IF YOU ARE NOT SURE WHO YOUR PORTFOLIO LEAD IS, PLEASE CONTACT [Stephanie Newburg](#) FOR HOME PROJECTS AND [Jennifer Schenck](#) FOR LIHTC PROJECTS. WE WILL CONTINUE TO UPDATE OUR WEBSITE AND THIS DOCUMENT AS THE COVID-19 SITUATION UNFOLDS.

2. HOW IS AHC PRACTICING SOCIAL DISTANCING?

IN COMPLIANCE WITH THE CURRENT CDC GUIDELINES, **ALL AHC STAFF ARE WORKING REMOTELY.** EMAIL IS THE BEST METHOD OF COMMUNICATION AT THIS TIME; HOWEVER, STAFF WILL BE CHECKING VOICEMAIL PERIODICALLY. FOR THE MOST CURRENT RECOMMENDATIONS, GUIDELINES AND UPDATES FOR COVID-19, PLEASE REFER TO THE [CDC GUIDELINES](#).

3. WHAT DOES AHC RECOMMEND AS BEST PRACTICES FOR MANAGEMENT TO COMPLY WITH PROCESSING INITIAL CERTIFICATIONS AND ANNUAL RECERTIFICATIONS?

THERE IS NO QUESTION THAT DOCUMENTATION FOR HOUSEHOLD ELIGIBILITY MAY BE DIFFICULT TO OBTAIN IN THE SAME MANNER AS BEFORE THE COVID-19 PANDEMIC. IF/WHEN THE IRS PROVIDES GUIDANCE SPECIFIC TO SEC. 42, AHC WILL MAKE REVISIONS AS NEEDED. ANY INFORMATION FROM AHC REGARDING PROCESSING INITIAL CERTIFICATIONS AND ANNUAL RECERTIFICATIONS DURING THE COVID-19 PANDEMIC WILL BE SHARED WITH MN HOUSING, SUBALLOCATORS AND HOME PARTICIPATING JURISDICTIONS TO OBTAIN THEIR INPUT PRIOR TO DISTRIBUTION.

HUD HAS PUBLISHED A [Q&A DOCUMENT](#) THAT ADDRESSES SEVERAL OF THE MOST COMMON QUESTIONS WE HAVE RECEIVED FROM OWNERS/MANAGEMENT COMPANIES. AHC ADVISES THAT YOU UTILIZE THESE RECOMMENDATIONS ON A CASE BY CASE BASIS, FOR BOTH YOUR LIHTC AND HOME HOUSEHOLDS.

OUTLINED BELOW ARE ANSWERS TO A FEW OF THE MOST COMMONLY ASKED QUESTIONS:

- **CAN WE USE A NOTE TO FILE TO EXPLAIN COVID-19 PROCEDURES USED?**

YES. HOWEVER, AS A MONITORING AGENCY **AHC DOES NOT RECOMMEND THE USE OF TEMPLATE OR BLANKET LANGUAGE FOR ANY TENANT FILE CLARIFICATIONS.** FILE CLARIFICATIONS ARE FILE SPECIFIC. THEY SHOULD CLEARLY DEFINE THE ISSUE AND EXPLAIN MANAGEMENT'S DUE DILIGENCE RESPONSE TO THE ISSUE. AHC RECOGNIZES THAT MANY FILE CLARIFICATIONS WILL BE VERY

SIMILAR DURING THE COVID-19 PANDEMIC, BUT THE FILE CLARIFICATIONS SHOULD STILL BE SPECIFIC TO THAT FILE.

- **CAN WE USE SELF-CERTIFICATIONS OF INCOME & ASSETS FOR NEW MOVE-INS AND OBTAIN VERIFICATIONS LATER?**

No. FOR INITIAL/MOVE-IN CERTIFICATIONS, THE USE OF SELF-CERTIFICATIONS OF INCOME OR ASSETS IS NOT ACCEPTABLE AND WOULD BE CONSIDERED NON-COMPLIANT.

- **WHAT HAPPENS IF WE ARE NOT ABLE TO COMPLETE RECERTIFICATIONS ON TIME?**

FOR 100% TAX CREDIT PROJECTS, RECERTIFICATIONS THAT HAVE BEEN RETROACTIVELY COMPLETED WILL NOT BE CONSIDERED NON-COMPLIANT. FILE CLARIFICATIONS SHOULD EXPLAIN THE CIRCUMSTANCES OF EACH INDIVIDUAL RECERTIFICATION AND ANY SIGNED AND DATED DOCUMENTS/FORMS SHOULD INCLUDE “TRUE AND CORRECT AS OF” LANGUAGE.

FOR MIXED INCOME PROJECTS, RECERTIFICATIONS THAT HAVE BEEN RETROACTIVELY COMPLETED WILL NOT BE CONSIDERED NON-COMPLIANT. FILE CLARIFICATIONS SHOULD EXPLAIN THE CIRCUMSTANCES OF EACH INDIVIDUAL RECERTIFICATION AND ANY SIGNED AND DATED DOCUMENTS/FORMS SHOULD INCLUDE “TRUE AND CORRECT AS OF” LANGUAGE. **IT IS IMPORTANT TO KEEP IN MIND THE AVAILABLE UNIT RULE (AUR) WHEN COMPLETING RETROACTIVE RECERTS AT MIXED INCOME PROJECTS.** VIOLATIONS OF THE AUR MAY RESULT IN CREDIT RECAPTURE FOR PROJECTS WITHIN THE CREDIT PERIOD (FIRST 10 YEARS OF COMPLIANCE PERIOD).

- **CAN MANAGEMENT STAFF COMPLETE FORMS VIA TELEPHONE CALLS WITH RESIDENTS?**

Yes. MANAGEMENT STAFF CAN COMPLETE THE HOUSEHOLD QUESTIONNAIRE IN EXTENUATING CIRCUMSTANCES. THE COVID-19 NATIONAL EMERGENCY QUALIFIES AS AN EXTENUATING CIRCUMSTANCE. THE STAFF MEMBER COMPLETING THE QUESTIONNAIRE SHOULD SIGN AND DATE THE FORM AS THE FORM INSTRUCTS (INCLUDING THE REASON FOR ASSISTANCE, JUST AS YOU WOULD IN ANY OTHER CASE) AND THE FILE SHOULD BE CLARIFIED WITH AN EXPLANATION OF THE METHODS USED. PLEASE KEEP IN MIND THAT IT MAY BE NECESSARY TO OBTAIN ORIGINAL SIGNATURES AT A LATER DATE.

- **WHAT DO WE DO IF WE CANNOT OBTAIN ORIGINAL SIGNATURES? (ANSWER EXTRACTED FROM HUD Q&A DATED 4/2/20, PG. 8)**



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.

- **WHAT METHODS OF VERIFICATION ARE ACCEPTABLE WHEN ORIGINAL DOCUMENTS ARE NOT AVAILABLE? (ANSWER EXTRACTED FROM HUD Q&A DATED 4/2/20, PG. 8)**







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. DOCUMENTATION INCLUDES, BUT IS NOT LIMITED TO, PAYSTUBS, (SOCIAL SECURITY) SS/SUPPLEMENTAL SOCIAL SECURITY (SSI)/STATE SUPPLEMENTAL PROGRAM (SSP) AWARDS, BANK STATEMENTS AND PUBLIC ASSISTANCE DOCUMENTS. IF ELECTRONIC DOCUMENTATION IS RECEIVED BY THE OWNER, AND ORIGINAL DOCUMENTS ARE REQUIRED BY HUD HANDBOOK 4350.3, REV-1, THE OWNER MUST COLLECT THE ORIGINAL DOCUMENTS FROM THE TENANT AT A LATER DATE.

QUICK TIP: DID YOU KNOW THAT MOST CELL PHONES HAVE THE ABILITY TO SCAN DOCUMENTS? HERE ARE DIRECTIONS ON HOW TO UTILIZE THIS ON BOTH APPLE AND ANDROID DEVICES:

IPHONE DIRECTIONS TO SCAN A DOCUMENT

1. OPEN A NOTE OR CREATE A NEW NOTE.
2. TAP , THEN TAP SCAN DOCUMENTS.
3. PLACE YOUR DOCUMENT IN VIEW OF THE CAMERA ON YOUR DEVICE.
4. IF YOUR DEVICE IS IN AUTO MODE, YOUR DOCUMENT WILL BE AUTOMATICALLY SCANNED. IF YOU NEED TO MANUALLY CAPTURE A SCAN, TAP  OR ONE OF THE VOLUME BUTTONS.
5. DRAG THE CORNERS TO ADJUST THE SCAN TO FIT THE PAGE, THEN TAP KEEP SCAN.
6. YOU CAN ADD ADDITIONAL SCANS TO THE DOCUMENT OR TAP SAVE WHEN YOU'RE DONE.

ANDROID DIRECTIONS TO SCAN A DOCUMENT

1. OPEN THE GOOGLE DRIVE APP 
2. IN THE BOTTOM RIGHT, TAP ADD 
3. TAP SCAN 
4. TAKE A PHOTO OF THE DOCUMENT YOU'D LIKE TO SCAN
 - ADJUST SCAN AREA: TAP CROP 
 - TAKE PHOTO AGAIN: TAP RE-SCAN CURRENT PAGE 
 - SCAN ANOTHER PAGE: TAP ADD 
5. TO SAVE THE FINISHED DOCUMENT, TAP DONE 