



Management Bulletin #502

DATE: June 9, 2020

TO: Owners/Agents of Properties Financed or Assisted by IHDA

CC: Asset Management Department Staff

FROM: Asset Management Department, IHDA

RE: Updates to COVID-19 Guidance

SUMMARY:

Owners and management agents should be aware of new or continuing regulatory relief measures put into effect by HUD, the IRS, IHDA and/or the State of Illinois.

Electronic Signatures and Documents: On May 26, 2020, [HUD Notice H-20-4](#) provided additional guidance to multifamily owners and management agents on the use of electronic signatures, and the electronic transmission and storage of documents. The Notice applies to properties funded with programs of the HUD Office of Multifamily Housing, including Section 8, Section 202, Section 811 PRA, Section 236, and Section 221(d)(3).

HUD's Notice extends permission to use electronic signatures and documents wherever existing HUD guidance requires original signatures or documents, and for all HUD forms or owner created documents related to asset management, contract renewal, and occupancy.

HUD's Notice identifies some exceptions for tenant notices that regulations require to be sent by first class mail, hand delivered, or posted in public spaces. Owners and agents must also accept the use of paper copies and wet signatures for all documents if the tenant requests these be used.

LIHTC Program Tenant Income Certifications: The LIHTC program does not prohibit owners from accepting tenant income certifications (TICs) that have been signed and submitted electronically. IHDA will allow owners to accept electronic TICs for the duration of the COVID-19 emergency, provided the owner add a clarification record to the tenant file explaining how the identity of the tenant who submitted the certification was verified.

Governor Pritzker's Disaster Proclamation: On Friday, May 29, 2020, Governor Pritzker issued an additional Disaster Proclamation in effect for 30 days, through June 29, 2020.

The following moratoriums and waivers previously announced to extend for the duration of the Governor's Proclamation remain in effect.

Illinois Eviction Moratorium: As described in [IHDA Management Bulletin #501](#), Governor Pritzker imposed a moratorium on the initiation and enforcement of evictions in Illinois for the duration of the Governor's Disaster Proclamation.

Federal restrictions on evictions for non-payment of rent implemented under the CARES Act also described in *Management Bulletin #501* also remain in effect.

IHDA Physical Inspections: As announced in [IHDA Management Bulletin #495](#), IHDA continues to postpone physical inspections at all properties for the duration of the Governor's Disaster Proclamation.

IHDA Management and Tenant File Reviews: As announced in [IHDA Management Bulletin #495](#), all IHDA on-site management reviews and tenant file reviews will be conducted remotely using IHDA's BDS delivery server for the duration of the Governor's Disaster Proclamation. Instructions for submitting documents through BDS is available in the [BDS User Guide](#) on the Property Manager's page of IHDA's website.

Continuation of Additional Waivers: The following waivers announced previously remain in effect.

Section 8 and Section 811: As described in [IHDA Management Bulletins #496 and #497](#), HUD has suspended all Management and Occupancy Reviews for Section 8 and Section 811 properties. The suspension includes the desk review portion of the MOR, and will continue until further notice.

LIHTC Income Certifications: As described in [IHDA Management Bulletin #498](#), owners of LIHTC properties have until July 15, 2020 to perform annual tenant income certifications if they were originally due to be performed between April 1, 2020 and July 15, 2020.

HOME Initial Certifications: As described in [IHDA Management Bulletin #499](#), IHDA will continue to implement HUD's waiver for income determinations, allowing the use of self-certification in lieu of source documentation for applicants in need of emergency assistance. HUD's waiver remains in effect through December 31, 2020.

Social Security Number Documentation: IHDA encourages owners to waive requirements for or accept delays in social security number documentation for programs for which Social Security Numbers are not required by federal regulation.

Social security numbers are required for Section 8 and other programs under the HUD Office of Multifamily Housing. HUD also requires that documentation be obtained within 90 days of a tenant being offered a unit.

HUD has not authorized extensions of the 90-day time limit. However, owners may accept forms of verification other than a social security card, such as an original document from any state or federal government agency that may have a social security number (such as a Medicaid ID).

IHDA will also recognize state or federal websites used to verify benefit information as verification of social security numbers.

ATTENTION:

Due to concerns surrounding COVID-19 (i.e. Coronavirus), IHDA will not be accepting visitors at our offices until further notice. Many on-site meetings are being held remotely or have been postponed. With no on-site meetings or visits, IHDA staff will continue to be available via email and telephone. We also urge you to check the IHDA website or call (312) 836-5200. Your patience is appreciated as we all adjust to this new work environment.