MANAGEMENT BULLETIN #516

DATE: February 8, 2021

TO: Owners and Agents of HOME Assisted and Financed Rental Properties

CC: Asset Management Department Staff

FROM: Asset Management Department, IHDA

RE: HUD Renews HOME Program Regulatory Relief

SUMMARY:

HUD's office of Community Planning and Development (HUD CPD) has extended and expanded COVID-19 regulatory waivers for properties with HOME funding.

HUD CPD first announced regulatory relief for the HOME program as of April 10, 2020 (see Management Bulletin #499). The waivers allowed participating jurisdictions to accept self-certifications in lieu of source documentation for applicants to live in HOME projects who need emergency assistance due to COVID-19, and to defer on-site inspections and management reviews through the end of 2020.

In a memo dated December 4, 2020, HUD CPD HUD announced it would extend waivers through September 30, 2021 and expand the scope of the waiver on income verification to apply to income re-certifications for existing tenants.

Participating jurisdictions are required to notify HUD which waivers they intend to implement. IHDA has notified HUD of its intent to implement the waivers described below.

Income Certifications: IHDA will continue to permit owners to accept self-certification in lieu of 3rd party documentation to verify income for applicants who need emergency assistance.

Further, owners may now also accept self-certification in lieu of source documentation for income re-certifications for existing tenants, including during the 6th year of the compliance period as described in 24 CFR 92.203(a)(1)(ii):

"Obtain from the family a written statement of the amount of the family's annual income and family size, along with a certification that the information is complete and accurate..."
HUD emphasizes that the certification must include all household income, including any unemployment or emergency benefits. However, household stimulus payments of up to $1,200 and the temporary $600 per week federal enhancement to unemployment insurance provided by the CARES Act are **not** to be included in calculations of income.

**Management Reviews:** IHDA will continue to conduct triennial management reviews and reviews of rent and income requirements electronically, unless a project owner is unable to make documentation available. Owners or agents requesting forbearance on the grounds they are unable to make documentation available must respond to IHDA’s notification of review to make that request. Any review that has been deferred must be conducted within 120 days of the end of the waiver period.

**Physical Inspections:** IHDA will continue to defer triennial HOME physical inspections for existing properties until further notice. IHDA will continue to monitor COVID-19 related conditions in Illinois and emerging federal guidance to inform related decision making. Any inspection that has been deferred must be conducted within 120 days of the end of the waiver period.

**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.