



To: Housing First Program Partners

Notice: **RED-21-14**

From: Real Estate Department

Date: March 9, 2021

Re: **Waivers and Alternative Program Requirements to Facilitate Use of Housing First Program Funds in Response to COVID-19 Pandemic**

The Indiana Housing and Community Development Authority (“IHCDA”) released a notice on April 23, 2020 regarding the implementation of waivers and alternative requirements in the Housing First Program to respond to the urgent needs presented by the COVID-19 pandemic. This memo extends these items through September 30, 2021 (unless noted otherwise) and provides clarifying language when necessary. All changes to the April 23, 2020 notice are shown in italics.

The waivers and alternative requirements included in this memo are not optional and are required to be adopted by all current award recipients.

### **Case Management**

To reduce burden on case managers who may not be in the field and participants who may not have access to technology for virtual meetings, IHCDA is temporarily waiving the requirement that participants meet with case managers at least monthly. Case managers are encouraged to continue meeting with participants and delivering services remotely via phone or other technology, but participants should not be terminated from the program for lack of access to such technology. This requirement is waived through *September 30, 2021* unless extended by future notice.

### **Alternative Income Examination**

In recognition that many participants are unable to obtain verification of their change of income due to their employers being closed, IHCDA is adopting the use of participant self-certification of income for initial, interim, and annual certifications in the Indiana Housing First program. This alternative income verification requirement may be used until *September 30, 2021* unless extended by future notice.

IHCDA has created an income self-certification form titled “Covid19 Income Self-Certification,” (Exhibit A) which must be used by participants to self-certify their income. Participants are not required to self-certify their income and may provide income documentation as they normally would if they so choose. Participants who self-certify income are subject to termination if they are later found to have provided false information. Self-certification may occur through email, postal mail, or fax.



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## **Alternative Housing Quality Standards (HQS) Inspection**

To comply with social distancing practices IHCD is implementing the following HQS alternative requirements. Together, these alternative requirements suspend all in-person inspection through *September 30, 2021*.

### **Initial Inspections**

IHCDA is no longer requiring an inspection be completed prior to participant move-in. Alternatively, owners are required to self-certify that they have no reasonable basis to have knowledge that life-threatening conditions exist in the unit or units in question. IHCDA has created a form titled "Covid19 Owner HQS Self Certification" (Exhibit B) which must be used for the self-certification process. Owner self-certification of HQS compliance may be used for RAP contracts with an effective date prior to *September 30, 2021*. All units placed under RAP contract through owner self-certification of HQS compliance must be inspected by *November 30, 2021* unless extended by future notice.

### **Annual Inspections**

The requirement to re-inspect units at least once annually is suspended until *September 30, 2021* unless extended by future notice. Units that are not inspected under this guidance will not require a future inspection.

### **Interim Inspections**

When a life-threatening HQS deficiency is reported by a tenant the recipient must notify the landlord of the deficiency. Owners will be provided 24 hours from notification to provide documentation to the recipient that the reported violation either does not exist or has been remediated. Documentation should include a photo of the reported violation, an invoice for the necessary repair, or tenant certification that it has been completed. IHCDA has created a letter titled "Covid19 Owner Notification of Life-Threatening HQS Violation" (Exhibit C) that must be used to provide the owner notification through email or postal mail.

When a non-life-threatening deficiency is reported the same alternative documentation procedure should be followed but with a 60-day deadline for remediation. The attached letter titled "Covid19 Owner Notification of NLT HQS Violation" (Exhibit D) that must be used to provide the owner notification through email or postal mail.

### **Space and Security Standards**

In instances where households want to add a member(s) to the household as a result of the COVID-19 emergency the normal HQS standard of 1 bedroom/sleeping area for every 2 household members will not apply. This applies only to units currently under lease and does not apply to new admissions or moves. Request to deviate from the normal space and security standards must be documented, including the reason for adding the household member(s). This waiver will cover households that exceed 2 household members for each bedroom/sleeping area until the end of their current lease or *September 30, 2021*, whichever is later. Following the



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expiration of the waiver the household will be required to comply with normal space and security standards.

### **“Housing Crisis” Definition and Term of Rental Assistance**

To minimize the impact of COVID-19 on the housing stability of participants, IHCD is amending the definition of Housing Crisis to include the following condition:

- They are a current Housing First participant (as of April 23, 2020) who, as a result of the COVID-19 crisis, has experienced a loss of income that is substantially limiting their ability to maintain safe and affordable housing or to not require emergency housing. A household served under this definition is experiencing a new housing crisis and is eligible to receive an additional 12 months of rental assistance.

Households only meet this condition if, at the end of the initial 24-month eligibility period, they are unable to maintain their housing due to loss of income as a result of the COVID-19 crisis. Household eligibility under this condition should only be considered at the end of the 24-month eligibility period and the additional 12 months of assistance would begin once the 24-month term was completed.

### **Eligible Program Costs**

*Section 5.4 of the Indiana Housing First Program Compliance Manual (“the Manual”) specifies that internet deposit or services are considered ineligible costs and may not be paid for with program funds.*

*For the duration of this waiver, internet costs necessary to provide supportive services are considered eligible under “Developing plans, making referrals, or connecting to the types of services listed above” as described in Section 5.2 of the Manual, Supportive Services. Internet costs may only be considered an eligible use of program funds if internet services are necessary for the household to receive supportive services (e.g., telehealth services or virtual case management meetings). This waiver is made to allow participants to access necessary services in a virtual setting, and to limit the impact of the Covid-19 pandemic on participants’ service plans.*

### **Opportunity for Feedback to IHCD**

IHCD encourages Indiana Housing First Program partners to provide feedback to IHCD to make us aware of any COVID-19 related issues you are experiencing and any additional guidance that may need issued.

Please contact the Supportive Housing Analyst via [VJennings@ihcd.in.gov](mailto:VJennings@ihcd.in.gov) or 317-232-7189.



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