

Guidance on completing Recertifications during COVID19 social distancing requirements – 03/24/2020

Full Recertification for Tax Credit Program:

1. Manager should send recertification notices in a timely manner via email attachment or arrange by phone to leave the notice at their apartment door. Attach the Recertification Questionnaire along with a note stating due to COVID19 restrictions a phone interview will be conducted instead of an in person interview. Arrange for them to deliver the Recertification Questionnaire back to you via email or delivery to rent drop box.
2. Copies of recert notices, emails and any notes attached should be kept in the resident file.
3. You may also want to ask for all second party verifications (statements, pay stubs, etc.,) at this time. It could save time in the event you are unable to collect third party.
4. Conduct the phone interview once the recertification questionnaire is returned. Address any incorrect answers or missing signatures at that time.
5. Generate third party verifications; have them signed and dated by resident/s and returned via email or drop box. If unable to obtain signatures on verifications, you may use the signature page of the application as a release. Please note this method may only be utilized for COVID19 recerts.
6. Make attempts at obtaining third party verification as you normally would. Our policy is two attempts within five business days. Verifications should be sent via fax or attachment to an email (or mailed as some banks may require). Remember to keep copies of fax receipts or emails of attempts to collect third party.
7. Once all necessary documentation is received, complete the recertification package, enter into Yardi, and generate the Tenant Income Certification (TIC). Attempt to have the TIC signed by all adult household members by delivering to their door. We do not recommend attaching the TIC to an email as social security numbers and income information appears on the TIC. Emails can be hacked so in order to avoid this; please do not email a TIC.
8. Signed TIC's may NOT be emailed to you. State Agencies require original (ink) signatures on TIC's. As an alternative, they can be dropped in your rent drop box.
9. If you are unable to obtain signatures on the TIC, please place a note in file indicating the TIC could not be signed due to COVID19 restrictions and ensure the note is dated. Once business returns to normal, or COVID19 social distancing restrictions are lifted, you must require all adult members of the household to sign and date with the CURRENT date. Do not backdate.

Self-Certification (Alternate Certification) for Tax Credit Program:

1. Manager should send recertification notices in a timely manner via email attachment or arrange by phone to leave the notice at their apartment door. Attach a note stating due to COVID19 restrictions a phone interview will be conducted instead of an in person interview, and schedule a time for the phone interview.
2. Copies of recert notices, emails and any notes attached must be kept in the resident file.

3. After completing the phone interview, enter the self-certified income and assets into Yardi. Ensure the income they have certified to is enough to cover the annual rent. If not, ask more questions. For example, if income is reported at \$8000 per year but rent is \$10,000 per year, how are they paying the additional \$2000 in rent? The answer could be a cash contribution or some form of income they did not originally report. Be sure to include this income in Yardi.
4. Once complete with all income, asset, student questions and household composition changes made, generate the "Alternate Certification", (known as "Short TIC" in Yardi).
5. Attempt to have the Alternate TIC signed by all adult household members by delivering or leaving at their door.
6. Signed Alternate TIC's may NOT be emailed to you. State Agencies require original (ink) signatures on TIC's. As an alternative, they can be dropped in your rent drop box.
7. If you are unable to obtain signatures on the Alternate TIC, please place a note in file indicating it could not be signed due to COVID19 restrictions and ensure the note is dated. Once business returns to normal, or COVID19 social distancing restrictions are lifted, you must require all adult members of the household to sign and date with the CURRENT date. Do not backdate.

Recertifications for HUD 50059's (HUD's Tenant Income Certification):

1. For 50059 certifications, the same procedures should be used for completing Full Recertifications as mentioned above in the Full Recertification for Tax Credit program with the following exceptions:
 - i) HUD allows 50059 properties to use second party verification without attempting third party.
 - ii) Enterprise Income Verification should still be utilized, however remember it cannot be used in your Tax Credit file so you may still have to attempt third party for the tax credit recertification.
2. The following instruction was given directly from HUD on their website:

The owner may consider extenuating circumstances (including COVID-19 considerations in the community) when the tenant is not available to attend the recertification interview, sign consent forms, or sign form HUD-50059. It is recommended the owner begin or accomplish the above actions within 90 days of being advised of the extenuating circumstance. When an extenuating circumstance is present, there is no change to the tenant's recertification anniversary date. The Total Tenant Payment/Tenant Rent and the assistance payment are effective retroactively to the recertification anniversary date. The owner must document the file why the signature(s) was not obtained and, if applicable, when the signature(s) will be obtained.