Asset Management Notice

To: All Owners and Managers **Notice # 2020-16**

From: Bob Conroy, Director of Asset Management **Issued: September 23, 2020**

In This Issue:

- **I. Expanded Rent Relief Program Ends on September 30, 2020**
- **II. Protection of Personal Identifiable Information (PII)**
- **III. New Address for MaineHousing**

I. Expanded Rent Relief Program Ends on September 30, 2020

In the MaineHousing Notice to Owner/Managers dated September 8, 2020, Owner/Managers were notified that MaineHousing had expanded our previous COVID-19 Rent Relief Program. The program is for renters who live in developments with MaineHousing financing and who cannot afford to pay their rent due to circumstances related to COVID-19.

We wanted to alert you that this current program will be concluding on September 30, 2020. If an Owner/Manager is planning to submit a project application on behalf of their residents, the completed application should be submitted by the **close of business on Wednesday, September 30, 2020.**

Should you have any questions concerning the conclusion of this program, please contact your Asset Manager.

II. Protection of Personal Identifiable Information (PII)

MaineHousing takes protection of tenant data seriously and we have processes and procedures in place to ensure any tenant PII provided to us remains safe, secure and accessible to only those required to see it. In addition, we do not retain any records with PII unless it is required. In instances when it is necessary, we take steps to eliminate any PII within those records to the best of our ability.

There have been several instances over the last several months of properties transmitting tenant PII to MaineHousing through unsecure email. Our IT Department has set up filters within our email system that flags any attachments that may have data considered to be confidential/PII.

If it is necessary for you to transmit data to us that contains PII, we ask that you either send it to us secure or use one of the transmission methodologies we have established for this purpose –

Sharefile or encrypted email. You can contact your Asset Manager who will be able to send you a link for both.

A copy of our policy regarding Protection of Personal Identifiable Information during MORs is attached to the Notice.

III. New Address for MaineHousing

In June, MaineHousing moved to a new location in Augusta. Our new address is:

26 Edison Drive
Augusta, ME 04330

For Section 8 projects, please make sure that when you are completing the HUD Form 9887/9887A Document Package for Applicant's Consent, the Contract Administrator section needs to correctly identify our new address.

Please contact your Asset Manager if you have questions.

IV. Attachments:

- **Protection of Personal Identifiable Information during MORs**
- **FEMA COVID-19 Housing Resource Roadmap**

Please note that MaineHousing provides notices as a service to our partners. Notices are not intended to replace ongoing training and do not encompass all compliance and regulatory changes that may occur on the wide arrange of housing programs in which we work. MaineHousing recommends partners establish an ongoing training program for their staff.

MaineHousing does not discriminate on the basis of race, color, religion, sex, sexual orientation, national origin, ancestry, physical or mental disability, age, familial status or receipt of public assistance in the admission or access to or treatment in its programs and activities. In employment, MaineHousing does not discriminate on the basis of race, color, religion, sex, sexual orientation, national origin, ancestry, age, physical or mental disability or genetic information. MaineHousing will provide appropriate communication auxiliary aids and services upon sufficient notice. MaineHousing will also provide this document in alternative formats upon sufficient notice. MaineHousing has designated the following person responsible for coordinating compliance with applicable federal and state nondiscrimination requirements and addressing grievances: Louise Patenaude, Maine State Housing Authority, 353 Water Street, Augusta, Maine 04330-4633, Telephone Number 1-800-452-4668 (voice in state only), (207) 626-4600 (voice) or Maine Relay 711.

MaineHousing
MAINE STATE HOUSING AUTHORITY

Protection of Personal Identifiable Information during MORs

Maine State Housing Authority (MaineHousing)'s Asset Management Department is committed to protecting the privacy of tenant data that we may be in possession of while conducting the required management and occupancy reviews.

Electronic Remote Reviews

Electronic reviews are conducting using a secure site called Sharefile. MaineHousing's IT department has done its review on the systems security and approved it for our company's use when needing to transfer sensitive files with external partners.

In order to ensure further protection of PII when the system is used by Asset Management Staff for MORs, the following protocols have been established:

The Asset Manager will coordinate with the property manager and obtain/share the following information:

- Names and contact information for each person who will need to be able to upload files to sharefile
- Date the sharefile review will begin
- Disclosure of the individuals who will have access to the files at MaineHousing

The Asset Manager will then contact the Portfolio Manager and provide the following details:

- Date of review
- Persons needing access to the system – names and contact information, for both the property and MaineHousing

The Portfolio Manager will set up the sharefile account and establish rights within that folder for both property management staff and MaineHousing staff who will need access to the files/folders. Portfolio Manager will have access to the folders at all times, but only as a means of being a security agent to ensure only authorized individuals get access to the folders. If it is requested additional people need access to the files during the review, no authorization or set up will occur until the Owner/Manager is notified and approves.

Once the review is completed and the report issued, the Portfolio Manager will set a trigger to delete the file folders based on the following:

If no responses required – files can be deleted immediately
If response required – set a one month notification to delete files from the secure server

Folders will not be maintained any longer than one month after the review is completed unless there are documented circumstances to warrant/require it. An instance of this would be a dispute regarding a particular finding. The file may be maintained until the issue is resolved.

Files reviewed at MaineHousing office

For reviews conducted at the MaineHousing facility, the lead Asset Manager and the Property Manager will establish and agree to the period of time the files will be in possession at MaineHousing which should be no longer than the period of time it is expected for the review to be completed. All files must be transported to and from MaineHousing by Property Management staff.

While files are in Asset Management's possession, the following protocols will be adhered to:

- Typically, when reviewing files, a conference room is set aside and all authorized persons go into the room to complete the tenant file review. Files shall not be left unattended without being properly secured. When the review is not in process, the files are kept in the assigned vault area with is always secured with limited access.
- Only authorized staff will be able to review these files – the individuals who will be assisting on the review and will have access to these files will be disclosed to the property manager.

Files reviewed on site (project or Management Company)

While on site, Property Management assigns the Asset Managers a secure location to work on the review of tenant file information. The Asset Manager(s) shall not leave the files unattended without first notifying management that they are temporarily stepping out, or needing to return the following day.

COVID-19 Housing Resource Roadmap

The purpose of the *COVID-19 Housing Resource Roadmap* (Roadmap) is to assist state, local, tribal, and territorial (SLTT) leaders and stakeholders with navigating some of the challenges, as well as the resources associated with the Coronavirus (COVID-19) pandemic.[1] Specifically, the Roadmap describes how supplemental appropriated funds, in particular under the CARES Act,[2] and certain ongoing annually funded federal programs, can be used to implement potential solutions.

Navigating the Roadmap

The Roadmap is based on challenges that federal departments and agencies who work directly with SLTT partners in housing and COVID-19 pandemic recovery have identified. Although not an exhaustive list, the identified challenges that follow fall within four topic areas:

- Nonpayment of Rent or Mortgage
- Housing and Service Needs of Homeless Populations
- Housing and Service Needs of Vulnerable Populations
- Reduced Temporary Housing and Shelter Capacity

> "The whole of government and the whole of community is involved in the fight against COVID-19. We will prevail, but it will take government, the private sector and individual Americans working together."
>
> **- Pete Gaynor, FEMA Administrator**

Each topic area consists of a flowchart of specific challenges, potential solutions, and federal department or agency resources, including federal funding support and technical assistance (e.g., Figure 1). Federal funding resources are either universal or solution-specific. Universal resources, for purposes of this document, have broad applicability to the solutions presented within the topic area, whereas resources directly linked to specific solutions are limited to the challenge presented.

Although the solutions are general in nature, additional considerations may be necessary to support those who may be at an elevated risk for contracting COVID-19, including those who may have physical, sensory, behavioral,

[1] Note that there is an acronym list beginning on page 14.

[2] It should be noted that the CARES Act provided millions of households with extensive Federal financial assistance in the form of unemployment compensation and stimulus payments that could be used to address housing-related needs. This document does not to elaborate on those resources, but users should recognize that future supplemental appropriations may provide additional assistance to further address household's housing and shelter needs.

FEMA

or intellectual disabilities affecting their ability to conform to infection control protocols such as masking, hand washing, or distancing.

The Roadmap also includes a Funding Index (Index) that provides an overview of resource structure and connection to the identified housing challenges. The Index is designed to help SLTT partners navigate resource availability, find opportunities to leverage assistance across federal programs, and avoid potential areas of duplication of benefits. For example, some of the resources, such as the Treasury Coronavirus Relief Fund, are federal resources allocated to state and local governments, and thus may be subject to state and local decision-making for eligible activities. This information can help inform decisions on how to apply funding to maximize recovery outcomes.

Please note that the information that follows is for general informational purposes only and are compiled with publicly available information or with information provided by sources that are publicly obtained and should be viewed as only a starting point for navigating challenges and available resources. The user should always directly consult the provider of a potential resource (i.e., the respective department or agency administering the federal program) for current program information, as well as to verify whether the user's proposed activities would be allowable under a particular program.

Figure 1: Nonpayment of Rent or Mortgage

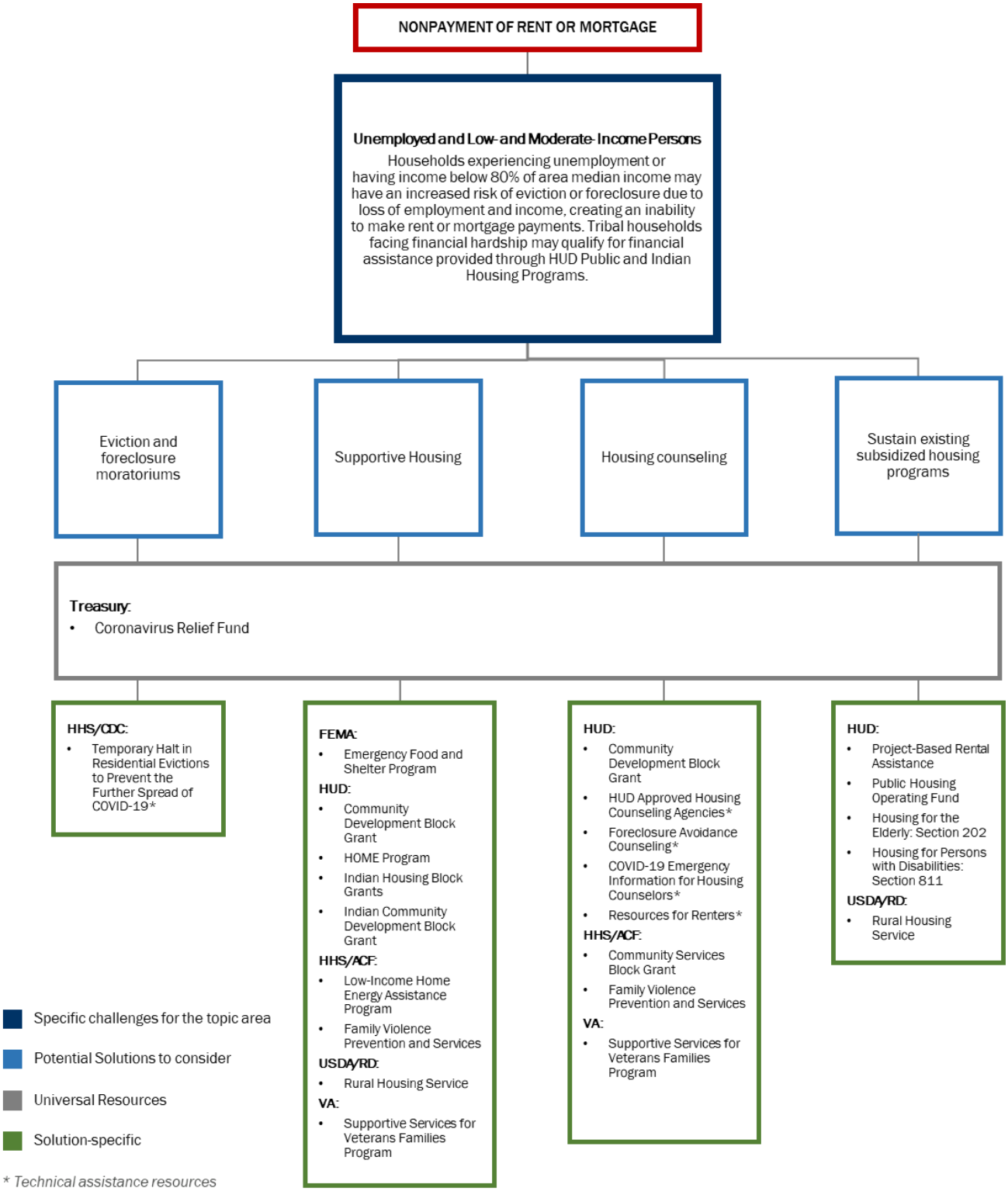


Figure 2: Housing and Service Needs of Homeless Populations

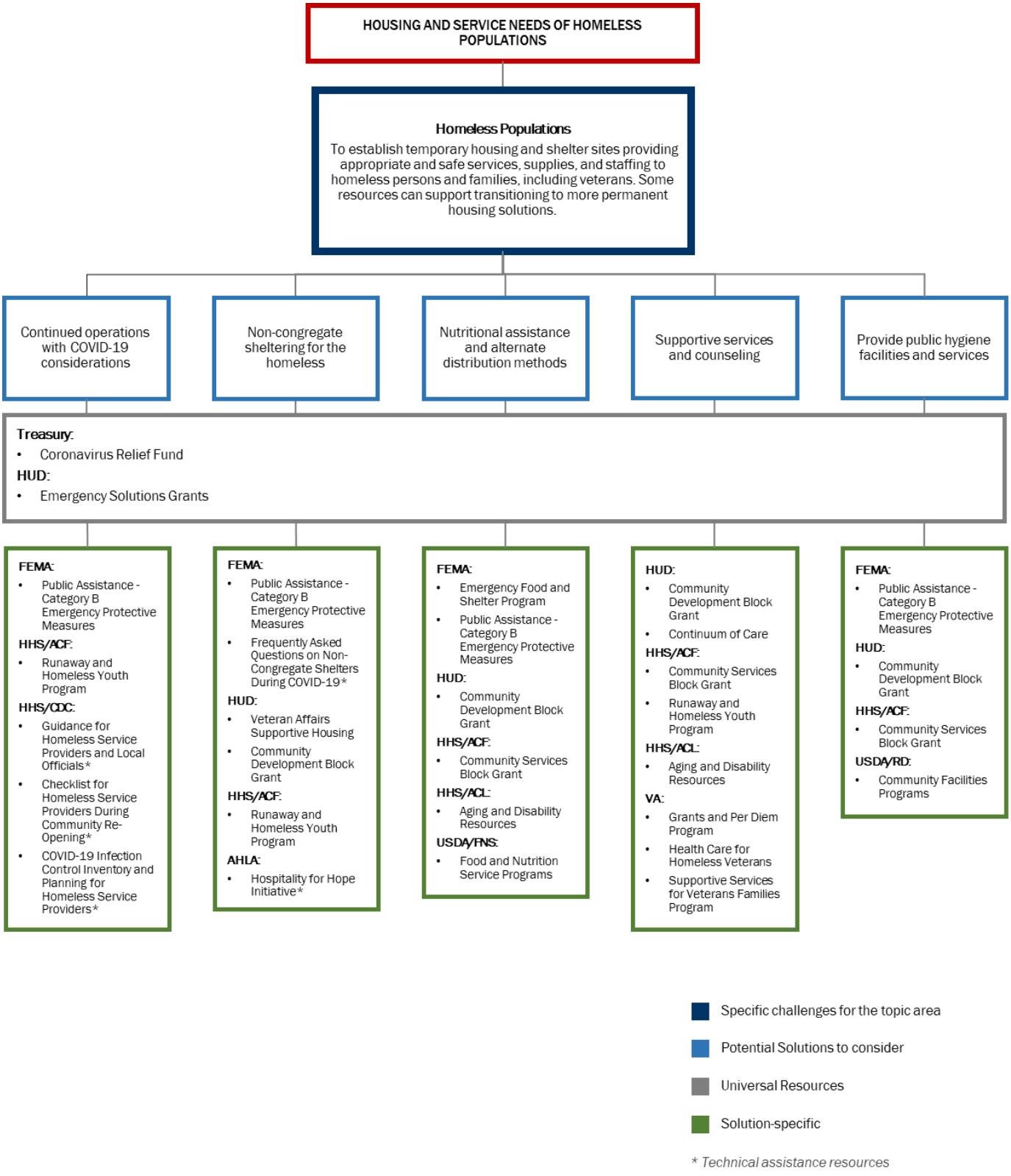


Figure 3: Housing and Service Needs of Vulnerable Populations

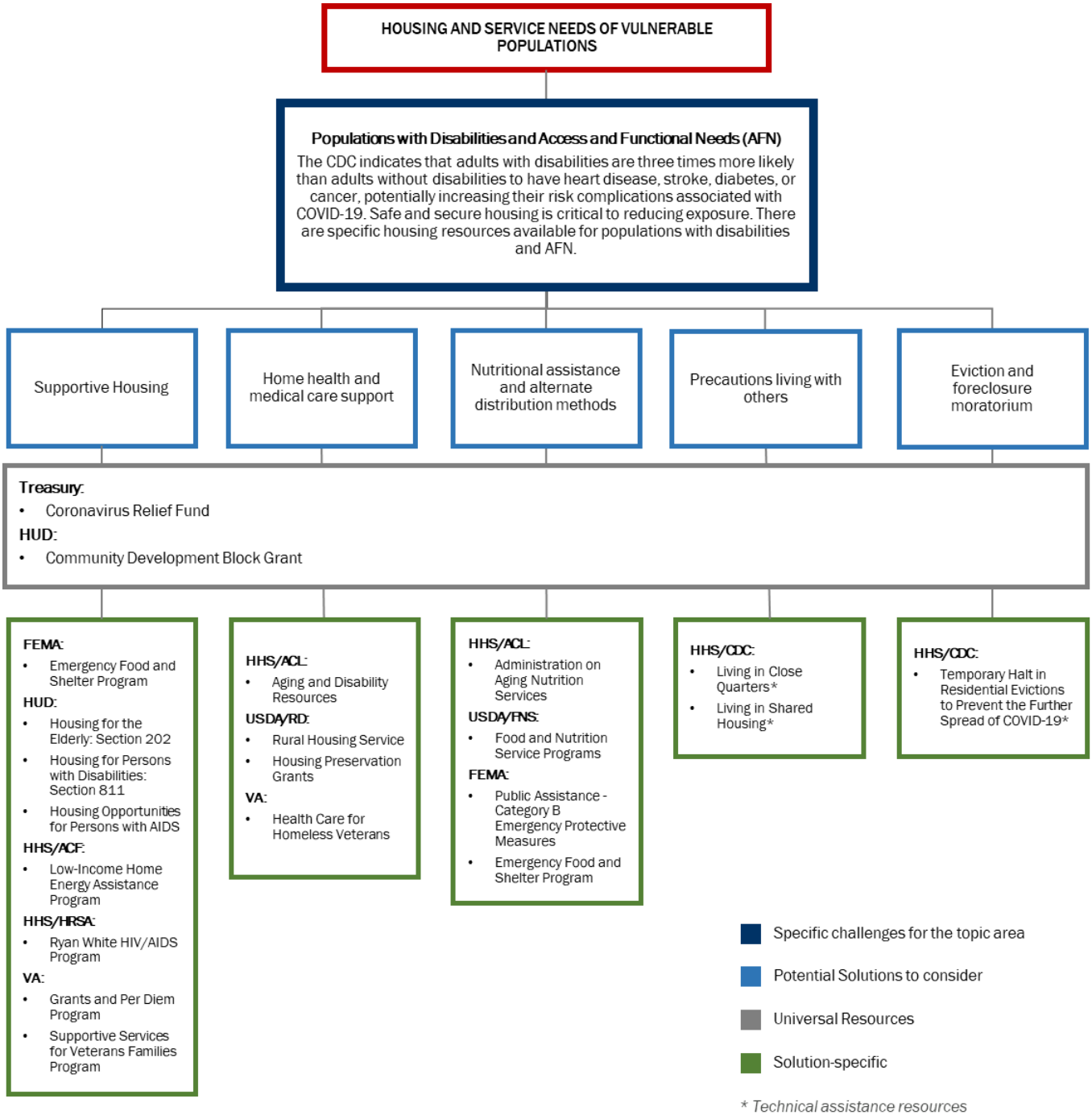
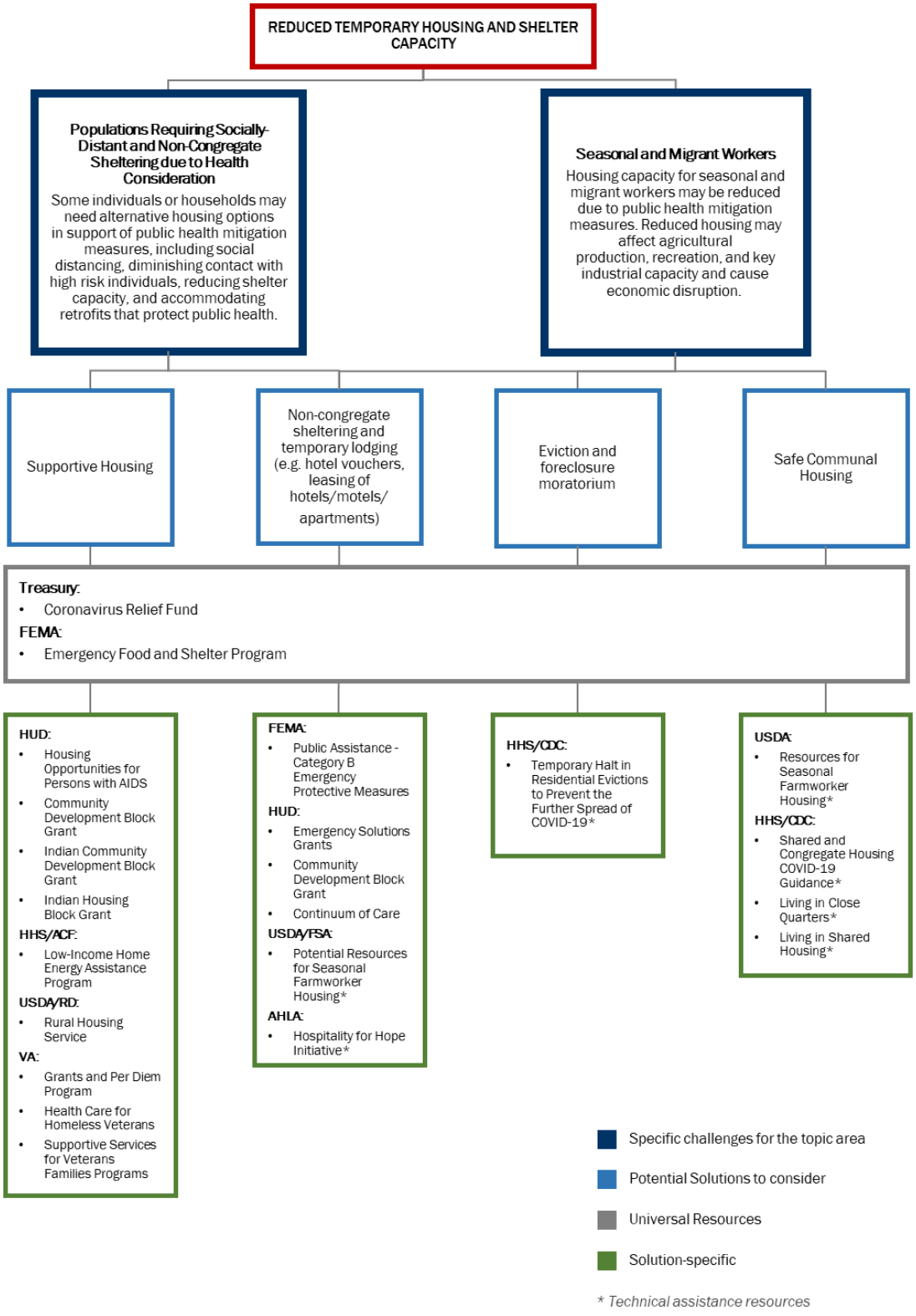


Figure 4: Reduced Temporary Housing and Shelter Capacity



Funding Index

Program	Program Delivery Details				Challenge				Additional information
	Funds to SLTT**	Direct Assistance to Program Providers	Statutory/ Regulatory Flexibility Provided	Funding Allocated as of 6/30/20	Nonpayment of Rent or Mortgage	Housing and Service Needs of Homeless Populations	Housing and Service Needs of Vulnerable Populations	Reduced Temporary Housing and Shelter Capacity	Links to Program Websites
Administration on Aging Nutrition Services (HHS/ACL)	✓			✓			✓		Administration of Aging Nutrition Services
Aging and Disability Resources (HHS/ACL)	✓	✓	✓	✓		✓	✓		Aging and Disability Resources
Community Development Block Grant–CV-CARES Act (HUD)	✓		New Program	✓	✓	✓	✓	✓	Community Development Block Grant COVID-19 Guidance
Community Development Block Grant–FYs 19 and 20 funding (HUD)	✓		✓	✓	✓	✓	✓	✓	Community Development Block Grant COVID-19 Guidance
*Community Facilities Programs (USDA/RD)**	✓	✓				✓			Community Facilities Programs
Community Services Block Grant (HHS/ACF)	✓			✓	✓	✓			Community Services Block Grant
*Continuum of Care (HUD) **	✓		✓	✓		✓		✓	Continuum of Care Program
Coronavirus Relief Fund (Treasury)	✓		New Program	✓	✓	✓	✓	✓	Coronavirus Relief Fund

** Items that may provide assistance but are not CARES Act funded.*
***State, local, tribal and territorial (SLTT) organizations*

Program	Program Delivery Details			Challenge					Additional information
	Funds to SLTT**	Direct Assistance to Program Providers	Statutory/ Regulatory Flexibility Provided	Funding Allocated as of 6/30/20	Nonpayment of Rent or Mortgage	Housing and Service Needs of Homeless Populations	Housing and Service Needs of Vulnerable Populations	Reduced Temporary Housing and Shelter Capacity	Links to Program Websites
Emergency Food and Shelter Program (FEMA)		✓		✓	✓	✓	✓	✓	Emergency Food and Shelter Program Fact Sheet
Emergency Solutions Grant – CARES Act (HUD)	✓	✓	✓	✓		✓		✓	Emergency Solutions Grants Program
Family Violence Prevention and Services Act Supplemental Funding (HHS/ACF)	✓	✓	✓	✓	✓				Family Violence Prevention and Services
Food and Nutrition Service Programs (USDA/FNS)	✓	✓	✓	✓		✓	✓		Food and Nutrition Programs
Grants and Per Diem Program (VA)		✓	✓	✓		✓	✓	✓	Grants and Per Diem Program
Health Care for Homeless Veterans Program (VA)		✓	✓			✓	✓	✓	Health Care for Homeless Veterans Program
*HOME Program (HUD)**	✓				✓				HOME Program
Housing for the Disabled: Section 811 (HUD)	✓	✓	✓		✓		✓		Section 811 Program
Housing for the Elderly: Section 202 (HUD)			✓		✓		✓		Section 202 Program
Housing Opportunities for Persons with AIDS – CARES Act (HUD)	✓		✓	✓			✓	✓	Housing Opportunities for Persons with AIDS
Housing Preservation Grants (USDA/RD)	✓	✓					✓		Housing Preservation Grants

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Indian Community Development Block Grant – CARES Act (HUD)	✓		✓		✓			✓	Indian Community Development Block Grant Program
Indian Housing Block Grant – CARES Act (HUD)	✓		✓	✓	✓			✓	Indian Housing Block Grant Program
Low-Income Home Energy Assistance Program (HHS/ACF)	✓			✓	✓		✓	✓	Low-Income Home Energy Assistance Program
Project Based Rental Assistance – CARES Act (HUD)		✓	✓		✓				Project Based Rental Assistance
Public Assistance - Category B Emergency Protective Measures (FEMA)	✓		✓			✓	✓	✓	Public Assistance Disaster- Specific Guidance – COVID-19
Public Housing Operating Fund – CARES Act (HUD)		✓	✓	✓	✓				Public Housing Operating Fund
Runaway and Homeless Youth Program (HHS/ACF)	✓	✓	✓	✓		✓			Runaway and Homeless Youth
*Rural Housing Service (USDA/RD)**	✓	✓			✓		✓	✓	Rural Housing Service
Ryan White HIV/AIDS Program (HHS/HRSA)	✓	✓	✓	✓			✓		Ryan White HIV/AIDS Program
Supportive Services for Veterans Families Programs (VA)		✓	✓	✓	✓	✓	✓	✓	Supportive Services for Veterans Families
Veterans Affairs Supportive Housing (HUD)		✓	✓	✓		✓			Veterans Affairs Supportive Housing

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Technical Assistance

General

For certain populations, housing needs may require additional considerations and efforts during the COVID-19 pandemic. The U.S. Department of Housing and Urban Development (HUD) provides some general resources for COVID-19 related housing issues and challenges:

- General Coronavirus Resources Page
- Public and Indian Housing COVID-19 Resources

Nonpayment of Rent or Mortgage

HUD, through HUD approved housing counseling agencies, provides housing counseling to families and individuals across the Country. These agencies are able to help with challenges such as renting, credit issues, and foreclosure avoidance. The HUD Office of Counseling provides a database of HUD Approved Housing Counseling Agencies to help those in need locate the closest sponsored housing counseling agency. In addition, HUD provides another resource that helps locale sponsored housing counseling agencies focused on Foreclosure Avoidance Counseling. For Housing Counselors, COVID-19 Emergency Information related to program updates, waivers, best practices, and Frequently Asked Questions are available.

HUD also offers resources for renters impacted by COVID-19. Some of these resources include:

- Tips to communicate with landlords;
- Overview of CARES Act eviction protections; and
- Link to database of Coronavirus-related protections by state.

Effective September 4, 2020, the Centers for Disease Control and Prevention (CDC) announced the issuance of an Order under Section 361 of the Public Health Service Act to temporarily halt residential evictions to prevent the further spread of COVID-19.

Homeless and Non-Congregate Shelter Costs

The CDC has provided an interim guidance for homeless services providers and local officials. This includes recommendations for facility layout, staffing, and safety considerations. Additional resources and tools include:

- Checklist for Homeless Service Providers During Community Re-opening
- COVID-19 Infection Control Inventory and Planning (ICIP) Tool for Homeless Service Providers

An alternative housing solution to accommodate for social distance includes expanding and establishing non-congregate shelter. The Federal Emergency Management Agency (FEMA) provides an overview of frequently asked questions related to non-congregate sheltering during COVID-19. Additionally, American Hotel and Lodging Association (AHLA), in conjunction with the U.S.

Department of Health and Human Services (HHS), has developed a national database of hotels and hospitality facilities that can support with non-congregate sheltering.

Housing and Service Needs of Vulnerable Populations

CDC offers information for People at Increased Risk and Other People who Need to Take Extra Precautions. This includes information regarding people at increased risk for severe illness that include older adults and people with underlying medical conditions. The CDC also provides guidance for other people who need extra precautions that include:

- Racial and Ethnic Minority Groups;
- Rural Communities;
- People Experiencing Homelessness;
- Pregnancy and Breastfeeding;
- People with Disabilities; and
- People with Developmental and Behavioral Disorders

For these individuals, non-congregate sheltering is safter than living in communal settings. When this is not possible, guidance for households living in close quarters and people living in shared housing should be considered.

Reduced Temporary Housing and Shelter Capacity

To support demand for non-congregate sheltering, the American Hotel and Lodging Association (AHLA), in conjunction with the U.S. Department of Health and Human Services (HHS), has developed a national database of hotels and hospitality facilities that can support with sheltering. The AHLA also links to resources such as Hospitality Helps which connects lodging providers willing to provide available beds to hospitals and government agencies which need additional beds.

Seasonal and Migrant workers face unique challenges, as often workers are provided housing by their employers. These houses are typically communal thus at higher risk for COVID-19 transmission. The USDA provides a list of potential resources to support seasonal farmworker housing. the CDC shares considerations for agriculture workers. In circumstances where non-congregate housing is unavailable, housing providers and residents should take extra precautions as outlined in CDC guidance for Shared Housing, and guidance for households living in close quarters and people living in shared housing.

Acronym and Agency Glossary

Acronym	Department or Agency
ACF	Administration for Children and Families (U.S. Department of Health and Human Services)
ACL	Administration for Community Living (U.S Department of Health and Human Services)
AFN	Access and Functional Needs
AIDS	Acquired Immunodeficiency Syndrome
AHLA	American Hotel and Lodging Association
CARES	Coronavirus Aid, Relief, and Economic Security
CDC	Centers for Disease Control and Prevention (U.S Department of Health and Human Services)
COVID-19	Coronavirus
FEMA	Federal Emergency Management Agency
FNS	Food and Nutrition Services (U.S. Department of Agriculture)
FY	Fiscal Year
HHS	U.S. Department of Health and Human Services (U.S Department of Health and Human Services)
HIV	Human Immunodeficiency Virus
HOME	HOME Investment Partnerships Program
HRSA	Health Resources and Services Administration (U.S Department of Health and Human Services)
HUD	U.S Department of Housing and Urban Development
ICIP	Infection Control Inventory and Planning
RD	Rural Development (U.S. Department of Agriculture)
SLTT	State, Local, Tribal, and Territorial
Treasury	U.S. Department of Treasury
USDA	U.S. Department of Agriculture
VA	U.S. Department of Veterans Affairs