



March 19, 2020

The Honorable Mike Pence  
Vice President of the United States  
White House Coronavirus Task Force  
The White House  
1600 Pennsylvania Avenue, NW  
Washington, D.C. 20500

Dear Mr. Vice President:

On behalf of LeadingAge, we thank the White House Coronavirus Task Force for its continued efforts. As we navigate these trying times, affordable housing communities serving primarily older adults need guidance and regulatory relief, and we urge the Task Force and HUD to help older adults with low incomes handle this global health emergency.

Centers for Disease Control data show the coronavirus has a disproportionate impact on older adults. While federal guidance has helped nursing homes, hospitals, and other health facilities serving older adults prepare for and respond to COVID-19 outbreaks, HUD-assisted communities serving older adults have yet to receive the level of regulatory relief and financial resources necessary to allow them to properly address critical health concerns.

LeadingAge represents more than 5,000 aging-focused organizations that touch millions of lives every day. Meanwhile, more than 1.6 million older adults live in HUD-assisted housing, with more than 1.1 million of these households living in small, medium, and large apartment buildings. We urge HUD and the White House Coronavirus Task Force to provide immediate relief and support for housing providers and residents throughout this global health emergency.

### **Relief for Housing Providers**

HUD's current emergency preparedness plans and guidance do not include infectious disease control. Affordable housing providers, especially those with predominantly senior populations, need significantly more help and direction from HUD specifically and from the federal government in general. Owners and agents of HUD-assisted senior housing need the following regulatory support so that communities can prioritize the safety of their residents and maintain the financial and physical soundness of the housing they provide. Effective immediately:

- 1.** HUD should suspend annual income recertifications, a burdensome administrative process that requires hours of staff time and in-person interactions with residents; HUD should also suspend the 15-month requirement for recertification information in their Tenant Rental Assistance Certification System so that communities continue to receive housing subsidy payments
- 2.** HUD should streamline the interim income recertification process by allowing residents to electronically self-certify income adjustments large enough to warrant a rent adjustment, and temporarily waive verification requirements for property staff

3. HUD should waive requirements for all wet signatures and paper documents, replaced by electronic signatures and file storage/sharing
4. HUD should automatically and temporarily renew expiring Housing Assistance Payment (HAP) contracts
5. HUD should suspend required Capital Needs Assessments (CNAs) or extend the due dates for items that rely on CNAs, such as Budget-Based Rent Increase requests
6. HUD should issue more complete guidance regarding a postponement of Management and Occupancy Reviews (MORs) and other ACC requirements
7. HUD should temporarily expand eligible use categories for applying operating funds, reserve for replacement accounts, and residual receipts to expenses incurred by COVID-19
8. HUD should clarify staffing policies for assisted properties, including expectations of property staff to screen residents, service providers and visitors, as well as using contract funds to pay for staff sick leave
9. HUD should temporarily waive requirements of owners under Chapter 38 of handbook 4350.1
10. HUD should work with other agencies to help communities access cleaning, PPE, and other critical supplies and services needed to continue serving older adults during this critical time.

### **Relief for Elderly Residents of Affordable Housing**

Given that there are thousands of predominantly older adult HUD-assisted communities and that their residents have more chronic conditions than their peers without housing assistance, seniors in HUD-assisted housing need federal support to prepare and respond to COVID-19. As this situation reaches crisis levels, elderly residents need the following assistance:

1. HUD should halt all current evictions proceedings and prevent the initiation of new evictions proceedings in HUD-assisted housing
2. HUD should suspend minimum rent requirements and expand hardship clauses to include the economic displacement of residents affected by COVID-19
3. HUD should direct multifamily owners and public housing authorities to notify residents of their right to an expedited interim income recertification or hardship exemption if their incomes have decreased due to COVID-19
4. HUD should work with health officials and other local, state, and federal agencies to offer mobile testing access for low-income elderly residents of affordable housing, many of whom have limited mobility or transportation options to get to clinics or testing sites.

In addition, the following requests from [our March 6 letter to the Task Force](#) have not been addressed:

## **1. Equipment and Staffing**

Affordable housing providers need funding and access to personal protective equipment as well as much more soap, sanitizer, and thermometers than they can readily access today. Emergency funding is also necessary for hiring additional staff to cover a community's needs as current staff become overburdened or affected by the quarantine, as well as for additional staff and cleaning services to keep residents as healthy as possible through this outbreak.

## **2. Guidance**

Affordable housing providers need guidance from HUD about how to implement a quarantine given in-building space constraints, how to communicate with residents about social distances and quarantines protocols, the need for service professionals to assist residents in their communities even in the event of a lock down, and what funds owners can access for outbreak response. Guidance to HUD's field offices is also needed to help the field offices in assisting predominantly older adult HUD-assisted communities manage this outbreak. Existing HUD advice for affordable senior housing providers to follow CDC information and contact local health departments do not begin to address the complexities of addressing COVID-19 in a HUD-regulated independent housing environment where every resident might have their own service providers who need to enter and exit the community.

## **3. Communication and Technical Assistance**

Predominantly older adult HUD-assisted communities need access to mobile coronavirus testing, documents translated into languages beyond English, Spanish, and simple Chinese, and the right phone numbers and emails providers should use to receive needed technical assistance from HUD. LeadingAge also recommends HUD communicate with residents, or provide language to owners and agents to do so, to assure residents they are not at risk of losing their housing should they need to be hospitalized or otherwise treated for the coronavirus.

Again, we look forward to working together with the White House Coronavirus Task Force to keep our communities resilient. For questions, please contact Linda Couch, vice president of housing policy with LeadingAge, at 202-508-9416 or [lcouch@leadingage.org](mailto:lcouch@leadingage.org).

Sincerely,

Katie Smith Sloan  
President and CEO