FHFC CRF Training #12: Final CRF Assistance and Program Completion

December 17, 2020
Our Thanks to the Florida Housing Catalyst Program

Sponsored by the Florida Housing Finance Corporation
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Thank You to CRF Staff

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Webinar Overview

- CRF Assistance
- Program Completion Topics
- Preparing for the CRF Monitor
- COVID Assistance in 2021
CRF Assistance
Update on Reimbursements

• Some are researching CRF Reimbursement of housing assistance funded by Charitable Donations or General Revenue
• Review recipient documentation and email chaney@flhousing.org before completing CRF Reimbursement

Update on Hardship Scenarios

• Some are sending summaries of applicants who paid rent with their credit cards. FHFC reviews and confirms when CRF may pay the rent portion of the credit card bill
• Also summaries of applicants who receive child support, alimony, or regular cash contributions from those who are unemployed.
CRF Successes

Rapid response shows the value of the SHIP Infrastructure

• $82 million Expended and Encumbered on November report

• Assisted 11,957 households with rental or mortgage assistance plus funds encumbered for another 5,729 households

• 28 Communities requested $25 Million in Additional CRF funds
Notable Local Government Accomplishments

• **Bay County** expended more than its original allocation by November and is working on Additional $400,000

• **Daytona Beach** requested 2nd round of additional CRF funds, $1.2 million anticipated to be expended

• **Lake County** expended $2.3 million, requested Additional $880,000

• **Polk County** expended $3 million, working on Additional $250,000

• **Osceola County** expended $6.3 million and has $36 million of general revenue for 2021 rent assistance
Payments in January

• In January, CRF staff may finish processing Rent and Mortgage Assistance applications received before the end of December.

• Any CRF checks written in January must be for eligible CRF assistance for the time period from March - December 2020.

• CRF Admin cannot pay for any January activity, so cover staff time from an alternative source.
POLL

Are you planning to cut any CRF checks in January?
Prepare for January Payments

- On December 30 report, encumber funds for every Rent/Mortgage Assistance case you are completing
  - FHFC will recapture Unencumbered Funds

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December 30 Deadline & January Payments

• Encumber funds for Reimbursements you are finalizing

• Complete preparation for CRF monitoring in December while CRF covers admin costs
Program Completion
Returning Unexpended Funds

• FHFC is issuing guidance soon
• LGs should start the repayment process now if they expect to have unexpended funds.
• All repayments should be done by January 15 if possible
• FHFC will provide wire and ACH instructions for the transfer of funds
CRF Admin for Auditing Expenses

Some CRF Admin costs occur after December 30

• FHFC will reimburse Post-December costs involved with CRF Audits

• Email Robert.Dearduff@floridahousing.org an estimate by December 23

• Allowable Costs include:
  – Staff time preparing files for auditing and monitoring
  – Staff time working with FHFC’s CRF monitors
  – Cost of the CRF Single Audit
  – CRF Final Report
CRF Reports

December 30 Report
• If all funds are expended: Press the submit button
• If some funds are encumbered: update on February 15 Final Report
Income Category on CRF Reports

• Some CRF Mortgage Assistance recipients are 120-140% AMI but the CRF Data Spreadsheet does not have this income category
  • Solution: report these homeowners as Moderate Income
Too Much Expended on Administration

• Report Admin Expenses that do not exceed 10% of CRF Expenses
• Cannot submit CRF Report if ‘too much’ Admin is reported—Validation Error appears
Questions and Answers
Preparing for the CRF Monitor
CRF Monitoring

- All local governments will be monitored in the next 3 years
- SHIP, CRF and HHRP Monitoring completed together
- 10% of total number of files across all programs will be monitored
Expected to be Monitored January – March 2021

• Bay Co/Panama City
• Orange County
• Jackson County
• Brevard County
• Duval County
• Pasco County
• Pinellas County
• Lake County
• Orlando
Review of the Monitoring Checklist

LG’s are required to have and maintain a financial tracking system

- Program Income (PI) and the revenue is properly reported
- Expenditures properly recorded and reconciled with the general ledger
- Compliance with the expenditure deadline
- Documentation of eligible expenditures in each file
- Compliance with the administrative expense cap based on expenditures
- Proper documentation for reimbursements in each file
Monitoring Checklist

• The Final Report was submitted by the applicable reporting deadline.

• Housing Finance Assistance Records are maintained for a period of no less than 5 fiscal years after funds expended and accounted for, and/or satisfaction of loans, whichever is the latest applicable event.

• Housing Applications of Non-Participating/unassisted files are maintained for a period of no less than 4 fiscal years after the last activity.

• For each denied applicant, a separate file was maintained and includes documentation to verify the applicant's denied status (including denial based on inactivity).

• Documentation of approvals from FHFC or FHC for hardship scenarios or activities
Monitoring Checklist

• All funds expended for administrative costs were allowable
  • Properly authorized (signed by requestor and approved by appropriate staff)
  • Accompanied by appropriate supporting documentation (invoices, etc.)
• Recorded accurately in the LG's general ledger accounts
• An executed contractual document between the LG and the Sub Recipient / Sub-Grantee and/or the Eligible Sponsor(s).
• Monitoring activities performed by the LG to evaluate the Sub Recipient / Sub-Grantee and/or Eligible Sponsor performance in complying with program requirements as well as with the terms and conditions of the contractual document.
Eligible Person or Household Monitoring Checklist

• The assistance amount provided did not exceed the LG's established maximum award limit or other requirements or limits established by the LG.

• The recording of a lien document that included recapture requirements (if assistance was provided in the form of a loan) and terms are consistent with program requirements.

• The assisted unit meets the definition of "Eligible Housing" for non-rental assistance.

• The type and amount of Project Delivery Costs.

• The Eligible Person/Household file contained at least minimum documentation requirements to support the type of award, the funding source, and payments made.
CRF Specific Metrics

Applies to all CRF assistance:
Assistance was provided to an Eligible Person or Household who suffered a hardship caused by the COVID-19 pandemic.

Exception: Homeless Individuals
Rental Assistance

Rental assistance provided in the following manner:

• Security and utility deposit assistance to secure permanent rental housing
• Eviction prevention not to exceed 10 month’s rent (March through December)
• Utility assistance to prevent discontinuation of services
Mortgage Assistance

- Assistance provided for Mortgage Payments applied to only the following payment components
  - Principal and Interest
  - Insurance
  - Homeowner Association Fees
  - Utilities

- Real Estate (Property) Taxes (Real Estate Taxes are specifically excluded UNLESS assistance is designed to prevent foreclosure)

- If Real Estate Tax payments included, documents verifying that mortgage payment was at least 30 days past due
Example of Documents

• An application
• An executed Duplication of benefit form
• A signed and notarized (or witnessed) Self-Certification of Income
• A resident income certification signed by SHIP staff in the file for homeowner activities
  • If third party verifications were requested, verify all reported income and assets were calculated correctly

Review CRF Manual for full list of documents
Compliance Requirements

• The appropriate yearly income limit chart was used to determine income eligibility for all housing activities excluding rental assistance
• Compliance with any and all locally mandated eligibility requirements
• Monthly update that hardship exist
• No more than 2 months of assistance after the applicant has fully recovered
Handouts

• Monitoring Plan
• Checklists

Once notified that you will be monitored, several documents will be available for download in the SHIP online A/R. Click the reference tab. At the bottom will be several reports for download.
COVID Assistance in 2021
Congressional Negotiations Include More Funds for Rental Assistance

• Congress has until Dec. 18 to pass a final spending bill or pass a continuing resolution (CR) to keep the government funded

• Most recent bipartisan relief package includes $25 billion for rental assistance administered through Treasury CRF program (not final)
  • 80% AMI or below + COVID hardship or housing insecure
  • Distributed to LGs who serve 200,000+ people and states
  • 10/2022 expenditure deadline

• Possible extension of CDC Eviction Moratorium
State and Local Funding for COVID Relief

- CDBG-CV & ESG-CV
- SHIP
  - Current disaster declaration expires Jan 2 – can be extended an additional 60 days
  - Presidential declaration is ongoing
- General Revenue
- CRAs
- Charity/Philanthropy
2021 Legislative Session

• Approximately $620 million in the State and Local Government Housing Trust Funds (this year’s collections + last year’s SHIP veto)

• Goal: full appropriation of Sadowski Trust Funds

• Collect stories from CRF-assisted households to show the importance of SHIP
POLL

Do you still have 19/20 SHIP Funds?

• Yes, Unencumbered dollars for assistance and admin funds
• Yes, Unencumbered dollars for assistance but no more admin
• Yes, Encumbered projects and admin funds
• Yes, Encumbered projects but no more admin
• No
Questions and Answers

Please complete webinar evaluation
CRF Holiday Song: 
12 Days of CRF Christmas

https://vimeo.com/490676775
Technical Assistance is Available

Call: 1-800-677-4548
Or Email:

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