



# HAWAII HOUSING FINANCE & DEVELOPMENT CORPORATION

## COMPLIANCE MONITORING GUIDANCE DURING COVID-19 PANDEMIC

The Hawaii Housing Finance and Development Corporation (HHFDC) continues to monitor the situation with the COVID-19 pandemic and as additional information becomes available, reserves the right to update or modify the guidance below.

In response to concerns related to COVID-19 and HHFDC's operations, HHFDC is implementing the following process for compliance monitoring for the safety of residents, affordable housing partners, staff, and consultants:

### ANNUAL AUDITED FINANCIAL STATEMENTS

Certain Declarations and/or Regulatory Agreements require the submission of Annual Audited Financial Statements (AFS). These are typically due within 90 days after the end of the fiscal year.

If you have not submitted the required AFS, please submit electronically in pdf format to Donna Ho, Compliance Specialist, at [donna.m.ho@hawaii.gov](mailto:donna.m.ho@hawaii.gov). If there are delays in completing the AFS, please also inform Compliance Specialist and request an extension.

### CERTIFICATION AND APPLICATION FOR RENTAL PAYMENTS UNDER THE RENTAL ASSISTANCE PROGRAM (RAP)

The Certifications and Applications for RAP are due by the 7th day of the prior month for which RAP is being requested.

Provide these RAP reports, along with supporting Tenant Income Certifications (TIC), electronically to [donna.m.ho@hawaii.gov](mailto:donna.m.ho@hawaii.gov). Please only mail hard copies of pages 1-2 of the Certifications and Applications for RAP. Page 2 needs to include requestor's original signature.

### HULA MAE MULTIFAMILY (HMMF) BOND REPORTS

The Quarterly HMMF Bond Reports must continue to be submitted to Spectrum electronically by the following dates:

- 1st Quarter: JAN-MAR, Due APR 15th
- 2nd Quarter: APR-JUN, Due JUL 15th
- 3rd Quarter: JUL-SEP, Due OCT 15th
- 4th Quarter: OCT-DEC, Due FEB 1st (with Compliance Monitoring Fee enclosed)

The reports must be signed by the owner/authorized representative. If you are unable to notarize the signature, note on the notary page, "Due to COVID-19 pandemic the document has not been notarized".

### FUNDS AUTHORIZATION REQUESTS FOR REPLACEMENT RESERVE

Provide Funds Authorization Requests electronically to [donna.m.ho@hawaii.gov](mailto:donna.m.ho@hawaii.gov). Please do not send hard copies.

### COMPLIANCE REVIEWS

Continue to provide responses electronically through email to Spectrum and/or Compliance Specialist.

## COMPLIANCE MONITORING GUIDANCE DURING COVID-19 PANDEMIC (continued)

### **PHYSICAL INSPECTIONS**

Spectrum is scheduled to return for reviews and inspections in October 2020. HHFDC reviews will be scheduled before the end of the calendar year. The COVID-19 situation will be assessed before reviews are conducted.

### **ELECTRONIC SIGNATURES**

HHFDC's current policy allows electronic signatures on all forms except the lease and the TIC. Management is required to meet face-to-face with the tenant and obtain a wet signature on the lease and TIC before issuing keys.

**With the current COVID-19 situation, e-signatures on leases and TICs are allowed.** In addition, if owners/agents cannot complete documentation, the reason should be noted in the file. When the pandemic is over, owners/agents should complete their documentation as soon as possible.

### **VERIFICATIONS OF INCOME AND ASSETS**

As non-essential businesses are being closed, management may not be able to obtain 3rd party verifications. Therefore, alternative forms of verification may be obtained (i.e., pay stubs, bank statements, etc.). Such alternate documentation must adequately verify that the households being placed meet the income and asset qualifications.

Ensure that tenants have been informed of your existing procedures regarding management office closures and emergencies.

Owners/agents need to follow CDC guidelines and the direction of local health officials. Owners/agents need to determine their steps and procedures to keep their staff and tenants safe.

Please contact Donna Ho at [donna.m.ho@hawaii.gov](mailto:donna.m.ho@hawaii.gov) if you have questions.