

## COVID-19 Supplemental Payment Request

### HUD Form 52671-E

#### ***Tips and Explanations***

*(Updated April 14, 2021)*

#### **Technical Tips**

- If you are having difficulty with calculated cells not populating, please ensure JavaScripts are enabled in your PDF reader. This may be confirmed under the “Preferences” or “Options” menus, dependent on the software being used.
- To eliminate difficulties with drop-down fields, try downloading the file and opening from within your PDF program, rather than attempting to populate directly in the web browser.
- Drop-Down menus operate differently in different PDF programs. You may be able to see a full list and select with a click of the mouse OR you may need to click in each field, then use the arrows on your keyboard to move through the list. Once the selection is made, the selected text may fill the whole box OR it may show as highlighted, it just depends which PDF software.
- All submissions should be on the final OMB-Approved form. Please use the updated form posted to HUD Clips in April 2021, which has an additional field to indicate the date range for which funds are being requested. Owners should not use any previously available version of the form.
- As indicated in the Notice, owners are strongly encouraged to submit the form in its original fillable format. For entities who do not have digital signature capabilities, requesters should fully populate and save the PDF form, then print, sign, scan, and save as a PDF. Owners must submit Form 52671-E with the required owner signature. However, when not using a digital signature, owners are encouraged to also attach a copy of their populated (unsigned) form in the fillable format. Sharing of CSP request information in this file format will accelerate processing to the benefit of requesting owners

## **Notes to Aid in Completing HUD 52671-E**

### **Getting Started**

- Please read Housing [Notice H 2021-01](#) thoroughly before attempting to complete form HUD 52671-E. Ensure the property is operating under a contract covered by the Notice (Section III) and meets the general eligibility criteria in Section VII.

*Note, the Notice is applicable to all Section 8 RAD conversions completed in prior years that are actively vouchering for funds under the PBRA account. Calendar year 2021 conversions that continue to draw funds from public housing accounts are not eligible.*

- Properties may request funds for expenses incurred from March 27, 2020 to November 30, 2020 only in very limited circumstances. Reimbursement for expenses incurred from December 1, 2020 through March 31, 2021, are available more broadly. Properties that previously received a CSP of any amount for a prior operating period may not submit another request for that same period. Please see Section V of the Notice for details.
- Also note that CSPs – both Tier I and Tier II – are only available for “critical funding needs”, meaning those financial needs that cannot be addressed with other project funds or external resources. Please see Section VI of the Notice for further explanation on how financial need must be evaluated and demonstrated, including key criteria on recent and anticipated distributions to Section 8 project owners.

### **Property Info**

- Contract Number(s): If a project has multiple Multifamily rental assistance contracts an owner must list all of them. Separate each by a comma. Contracts are typically an 11-digit alpha numeric code. Separate multiple contacts by a comma. Do not use hyphens within the contract #.
- Only one CSP request is allowed per-property/project; not one per contract. Scattered-site projects operating under one HAP contract are considered one property.
- Property Phone and Email: Please provide a phone number and email that will enable HUD/PBCA staff to contact individuals able to respond to follow-up questions on the CSP request.

### **Basic CSP Info**

- **Tier 1 or Tier II:** To determine if your request qualifies as Tier I or Tier II, first complete Parts I, II, and III (see below for details).

- **Operating Period:** You must indicate whether your request is for expenses in the 1<sup>st</sup> Operating Period (March 27, 2020 to July 31, 2020), 2<sup>nd</sup> Operating Period (August 1 to November 30, 2020), 3<sup>rd</sup> Operating Period (December 1, 2020 to March 31, 2021) or combines expenses from multiple operating periods. Requests covering multiple operating periods can only be combined if your total request is below the Tier I cap (see Section V of the Notice). If you tabulate expenses for multiple Operating Periods and find they exceed the Tier 1 Cap, then you will need to break the expenses out onto two or three separate CSP forms reflecting expenses for the different Operating Periods.

### **Parts I and II: Amounts Requested**

- All requested amounts must be captured in Part I and/or Part II of the form.
- Read section IV of Notice H 2020-1 to identify CSP-eligible costs. If unclear on eligibility for an expense, contact HUD or the contract administrator.
- Please complete each line item entry in whole dollars, rounding up or down as appropriate.
- **NEW:** Expenses for facilitating resident access to vaccinations should be reported under the most relevant cost category, i.e., administrative staff overtime or contract support, custodial staff overtime or contract support, additional PPE (for events), etc. Eligible transportation costs should be reported on the “Other” line.
- Four-digit codes indicated in Part I and Part II (e.g., 6900, 6310) reflect the standard HUD Chart of Accounts. For more information see Appendices to the [FASS User Guide](#).
- If any expenses are included on Line 7 “Other Eligible Costs”, the request must identify the corresponding four-digit expense/budget line code from the Chart of Accounts. See also [HUD-92547-A](#).
- Expenses for Service Coordination (Part II) may only be submitted for on-going, HUD-approved service coordinator programs that are funded from project operations (i.e., “budget-based”) or are funded in part from IWISH grants. Amounts should not be requested for positions/activities funded from a Multifamily Service Coordinator Grant from HUD; supplements to those awards are being provided separately. Eligibility validation will occur based on performance reporting submitted in 2019/2020 through *Standards for Success* or IWISH grant reporting mechanisms. Note, CSP cannot be requested for any cost increases previously reimbursed from IWISH grant funds.
- **Line 14 is the Total CSP Request. This is the maximum funding an owner might receive. This total is automatically calculated as the sum of amounts in Parts I and Part II.**

### **Part III: Tier 1 Standard Payment Cap**

- The purpose of Part III is to determine whether the requested amount needs to be evaluated as either Tier I or Tier II. If line 14 is less than or equal to Line 20, then the request is categorized as Tier I. If the amount on line 14 exceeds line 20, then the request must meet all Tier II requirements in order to be fully funded.
- If the property does not meet Tier II criteria, the owner should ensure amounts requested (Part I/Part II) are equal to or less than the Tier I Standard Payment Cap on line 20.
- Please be sure to review definitions in Footnote 6 of Notice 2021-1 for types of properties that are eligible for the increased “elderly property” allocation of \$1,000.
- The Line 13 Service Coordinator allocation is the lesser of \$3,000 or the amount on line 13. The cap cannot be increased by more than the actual eligible service coordinator expenses that were incurred.
- If the total request (line 14) is less than or equal to the Tier I Cap (line 20), an owner does not need to complete Part IV. Skip ahead to Part V of the form.

### **Part IV: Tier II Requests**

#### *Expense Documentation*

- Tier II CSP requests (those that exceed the Tier 1 Cap on line 20) require completion of Section V AND submission of expense documentation for any line item in Part I/II for which the individual line-item amount exceeds \$500.
- Please make sure all documentation is well organized and clearly labeled
- Line 21 is an automatically calculated cell that shows the amount by which an owner’s request exceeds the Tier I Standard Payment Cap. This is for the owner’s reference and HUDs when processing. Tier II expense documentation requirements apply to the all amounts under Part I and Part II, not just the line 21 increment.

#### *Threshold Requirements and Narrative Justification*

- To be eligible for Tier II funding, properties must meet least one of the following threshold criteria for the requesting property:
  - Multiple resident cases of COVID-19;
  - Documented on-site exposure threatening a high-risk population; and/or
  - An infection rate in the surrounding county exceeding 1,000 confirmed cases per 100,000 people on or prior to March 31, 2021. (Data available from the [CDC COVID-19 Data Tracker.](#))

- All Tier II requests must include a narrative justification that explains the circumstances at the property that necessitated the expenditures. Narratives must include information specifying how the property meets the threshold criteria and the activities taken in response that are related to the CSP request. This may include the number of residents reporting infection, any required quarantines, known exposure at the property, and specific activities taken in response. Guidance from county health officials and any property-specific interaction with health officials should be noted, as should statistics on infection rates in the surrounding community.
- In general, justifications should explain how COVID-19 impacts relate to and justify the expenditures for which the CSP reimbursement is now being requested.

#### *Financial Need Requirements*

- For all requests, owners certify by signing [Form 52671-E](#) that they have a valid financial need for the CSP funds, as defined in Section VI of Notice H 2021-01.
- In addition, for Tier II requests only, some owners will be required to submit additional property financial records and to complete the Financial Need Justification. Properties showing a net positive position on their most recent AFS or surplus cash calculation must also submit a compelling explanation of recent changes in financial position to justify necessity of the CSP (in box 24). See Section VIII of Notice H 2021-01 for details.
- Residual Receipts account balances above \$250 per unit must be requested and applied to offset COVID-19 cost increases prior to receiving CSP. Owners must take this into account when considering financial needs.

#### **Part V: Other Information and Owner Certifications**

- All requesters must respond to questions in Part V.
- Note, any SBA Paycheck Protection Program loan funds used to support property operations should be reported as CARES Act funds.
- Amounts received from prior CSP rounds do NOT need to be reported for Questions 25 and 26.
- Please read the Owner Certifications closely, in conjunction with the Notice. HUD anticipates post-approval compliance reviews and high likelihood of program audits.
- This certification may only be signed by the owner or a designated signatory. The delegation of signature authority for CSPs may or may not be covered by existing management agent agreements.

- The owner certification is as follows:

**Part V. Certification and Acceptance of Terms**

Owner's Certification: I certify that (1) the requested payment was computed in accordance with HUD's Housing Notice H2021-1. It reflects only expenses incurred during the operating period(s) specified for eligible activities and purposes. (2) No amount included on this funding request has been paid from other forms of governmental or philanthropic assistance provided to address the impact of COVID-19. (3) I have considered current project funds and anticipated revenues over the next nine months and require this funding in order to address project operating costs. (4) If receiving CSP assistance for a Section 8 HAP contract, I agree to deposit an amount equal to the amount of the CSP in the residual receipt account, prior to taking any cash distributions before 3/31/2022. Or, if the Section 8 contract and governing regulations do not require the project owner to maintain a residual receipt account, I agree that upon taking distributions at any point from the issue date of this notice through 3/31/2022, an amount at least equal to the amount of the CSP must be retained in the operating account to address future project costs that is over-and-above the resources needed for current operating requirements. (5) The property and ownership are in good standing with HUD, as defined in Section VII of Housing Notice 2021-1. (6) If receiving CSP assistance for a Section 8 HAP contract that expires within 120 days, I anticipate renewal of the contract and have not communicated intent to opt-out. (7) Upon request by the Department of Housing and Urban Development, its duly authorized representative, or the Comptroller General of the United States, I will make available for audit all books, records and documents related to this assistance payment. Warning: HUD will prosecute false claims & statements, which may result in criminal conviction and/or the imposition of criminal fines and/or civil penalties, to the full extent allowed by law.