

# Managing Your Housing Department or TDHE

IHBG-CARES WEBINAR SERIES –  
MODULE III

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# Goal for Today's Webinar

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Understanding how best to continue housing operations during a COVID-19 or other pandemic, and steps that can be taken to ensure that tribal families can continue receiving the benefits of housing program activities with minimal disruption.



# Agenda

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Administrative Operations
Personnel Issues
Routine Operations
Conducting Virtual Meetings
Future Considerations

# Administrative Operations



# Review: How Does Virus Spread?

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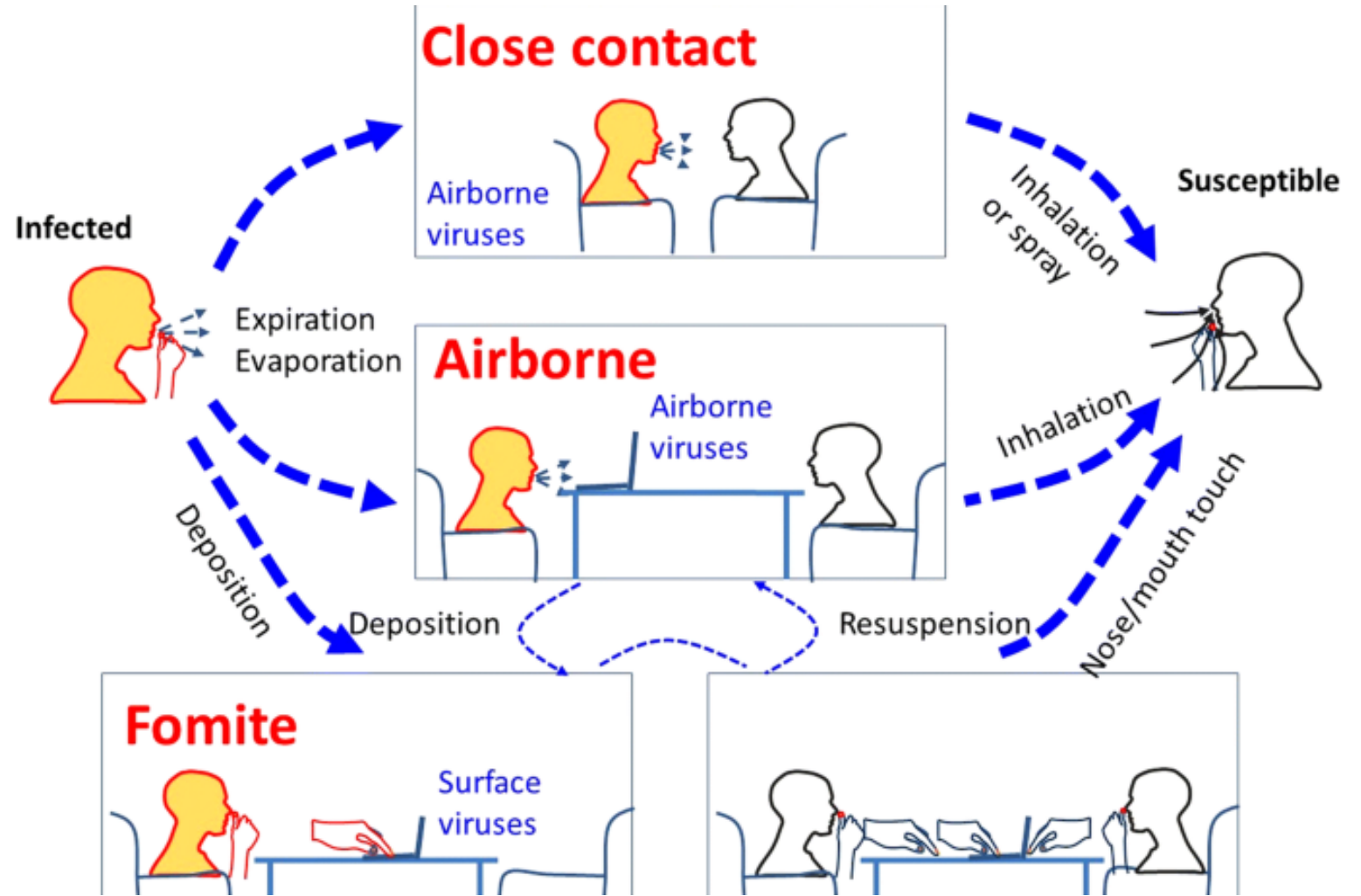
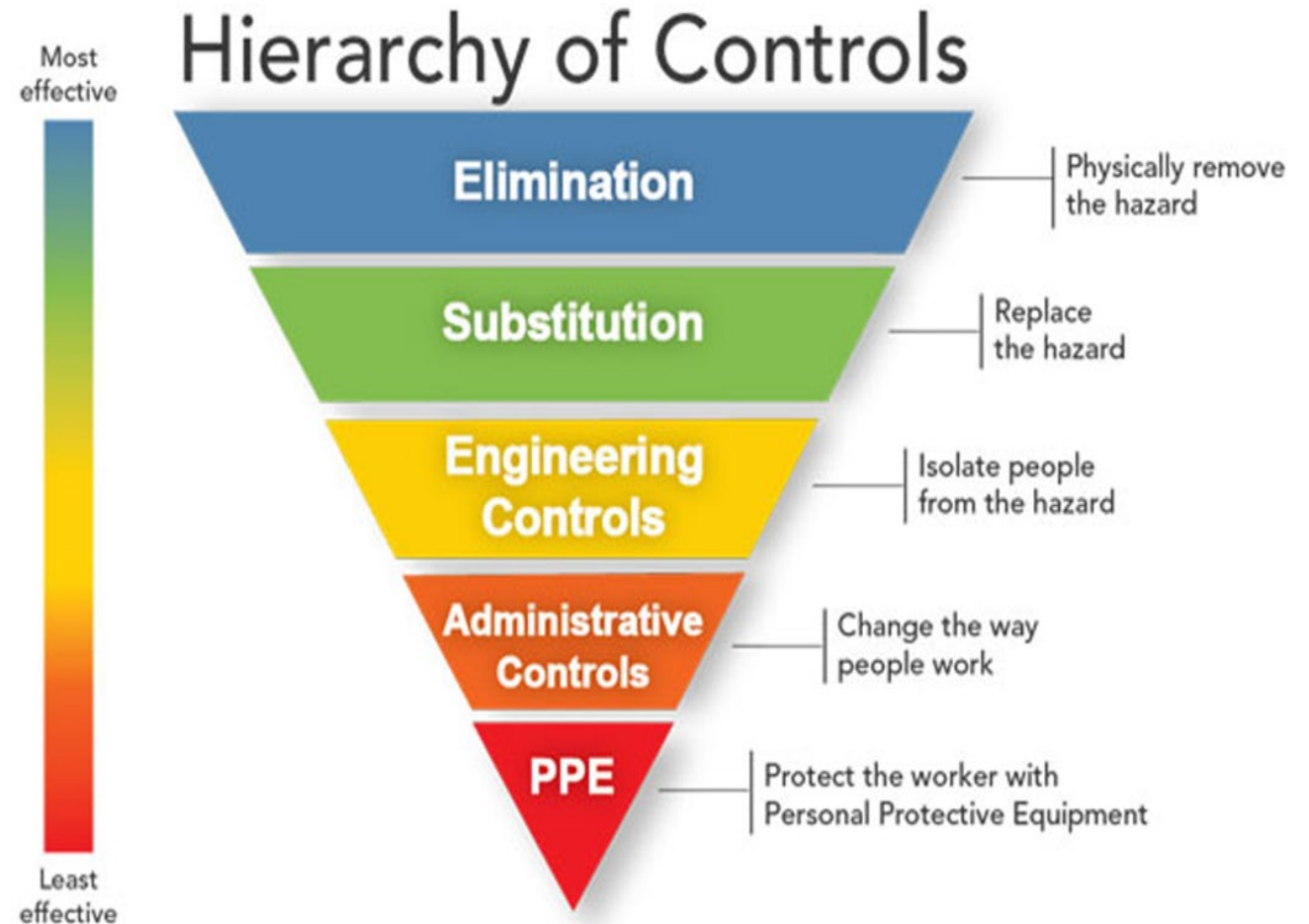
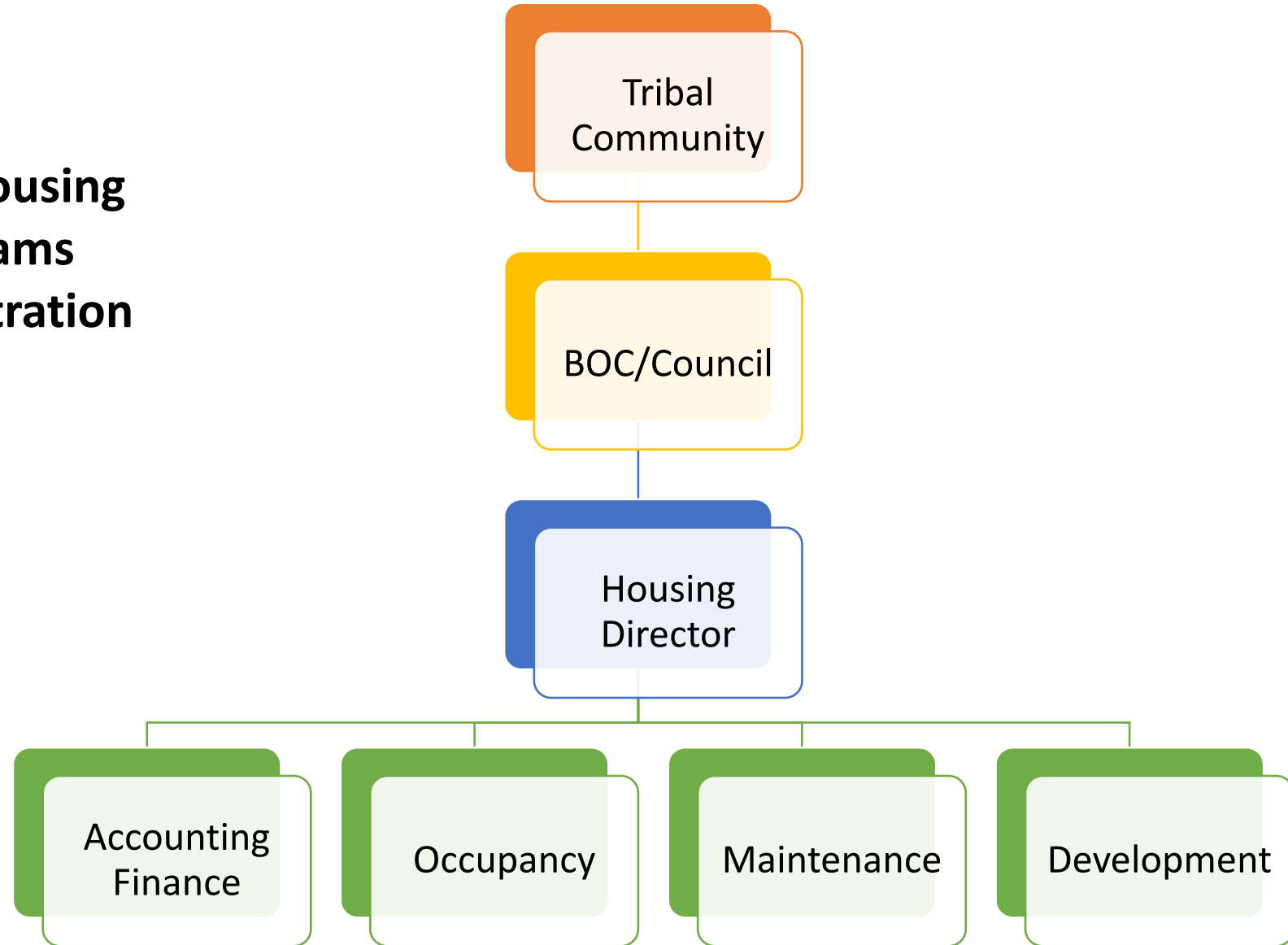


Image 1: Hierarchy of controls

1. Vaccinations
2. Alternative work schedules
3. Staff and visitor [COVID-19 screening](#)
4. Social distancing
5. [Masking](#) updates [for vaccinated people](#)
6. [Ventilation in buildings](#)
7. Hand hygiene
8. [Cleaning and disinfection](#)
9. Personal protective equipment



# Tribal Housing Programs Administration





# Staff Communication is Key



**Messaging service:** keep lines of communication open with a messaging service which might work better than email for quick conversations, project management, and sharing files quickly with your whole team.



**Email:** email should still be used for formal communications such as leave requests, formal assignments, company resources, etc.



**Video conferencing:** in addition to chat, use video conferencing for staff meetings and to retain the human element of teamwork.

# Personnel Issues

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# Dealing With Absenteeism

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Determine how you will operate if absenteeism spikes from increases in sick employees, those who stay home to care for sick family members, and those who must stay home to watch their children until childcare programs and K-12 schools can resume their normal schedules.

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Plan to monitor and respond to absenteeism at the workplace.

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Implement plans to continue your essential business functions in case you experience higher-than-usual absenteeism.

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Prepare to institute flexible workplace and leave policies.

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Cross-train employees to perform essential functions so the workplace can operate even if key employees are absent.

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# Policy and Procedure Revisions

- Leave (Time Off) Policies
  - Implement flexible sick leave policies and practices that are not punitive and enable staff to stay home when they are sick, have been exposed to someone with COVID-19, are caring for someone who is sick, or who must stay home with children if schools or childcare centers are closed.
  - Examine and revise policies for leave, telework, and compensation as needed.
  - Ensure that any relevant policies are communicated to staff.
- Limited, Staggered, or Rotated Shifts and Attendance Times
  - Consider ways to significantly reduce the number of attendees.
  - Use flexible worksites (for example, telework) and flexible work hours (for example, staggered shifts) to help establish policies and practices for physical distancing of 6 feet between staff and attendees.
  - Stagger attendance times or offer expanded hours of operation with limited attendance at a given time to minimize the number of attendees at the venue.

# Planning for Returning to Work

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- **Workplace Strategies Now:** Sensible strategies include practicing physical distancing, like moving desks apart and removing chairs, adding barriers, enhancing cleaning and safety measures, as well as supporting those who are working from home longer.
- **Workplace Strategies Near Future:** This could include new layouts in the space to help physical distancing feel more comfortable such as adding new elements to workstations, like glass or higher screens. New bleach-cleanable fabrics will be introduced. The workplace needs to provide more and better options for videoconferencing. Many tribes will continue to support working from home as a strategy to reduce density in the workplace.

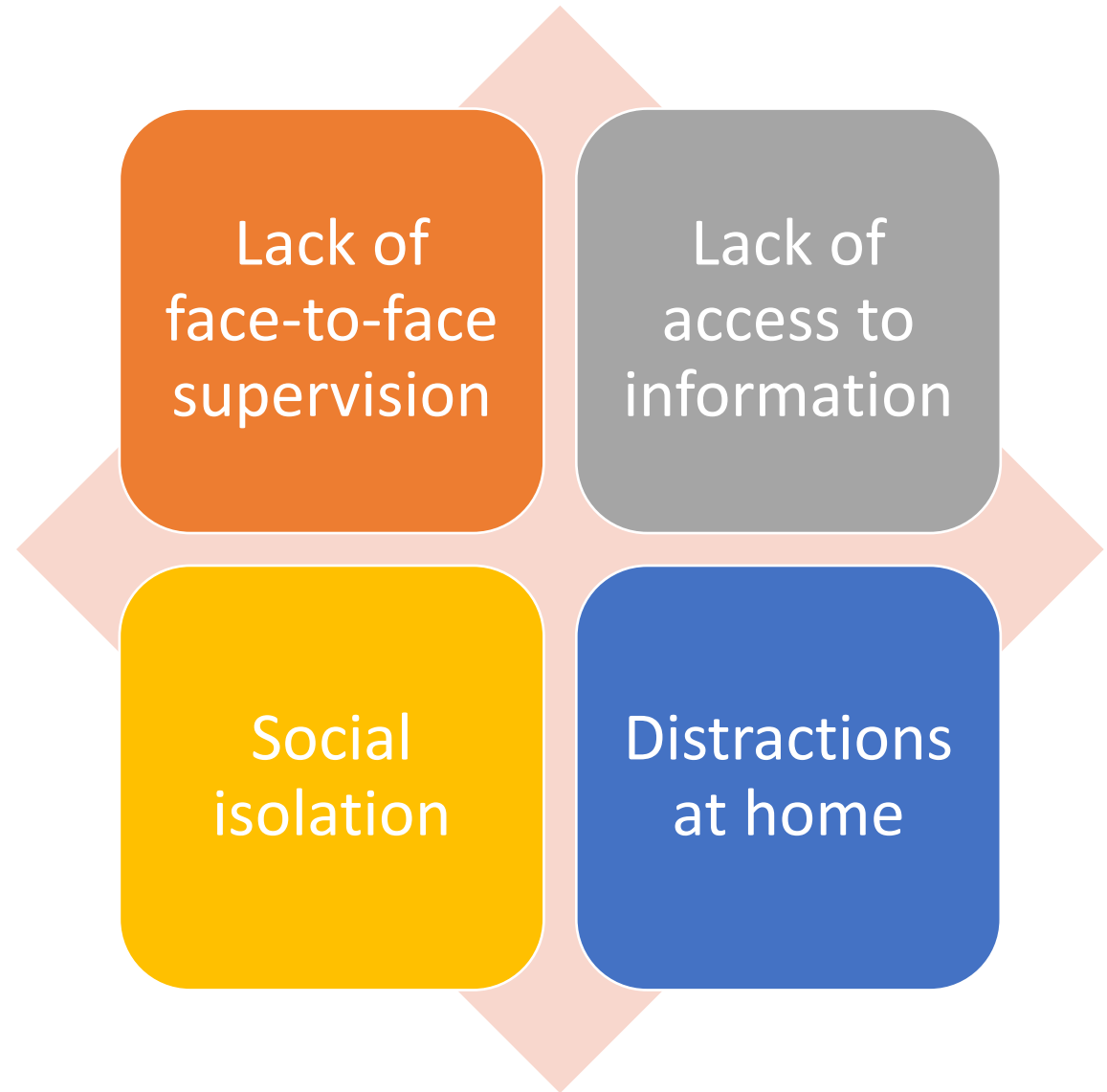
# Long-term Workplace Strategies

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- Planning paradigms driven by density and costs need to shift — think adaptability instead of permanence, fluid instead of fixed. People now have a whole new appreciation for being together and will want to feel a renewed sense of community.
- Tribes/TDHE's that try to return to the way things were before COVID-19 will probably struggle. They need to reinvent because volatility is inevitable, and the workplace needs to be ready to rapidly respond to the next disruption. The role of the workplace in a post-COVID-19 world is more important than ever.



# Challenges of starting to work remotely



# How managers can support employees

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01

Establish  
structured daily  
check-ins

02

Provide several  
different  
communication  
technology options

03

Establish “rules of  
engagement”

04

Provide  
opportunities for  
remote social  
interaction

05

Offer  
encouragement  
and emotional  
support



# Remote Work Policy Example

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# North Pacific Rim Regional Housing Authority

## Remote Work Agreement Form

New Agreement (1 year max): ☐

Renewal Request (1 year max): ☐

### Employee Information:

Name: \_\_\_\_\_

Job Title: \_\_\_\_\_ Department: \_\_\_\_\_

*Supervisors and Employees: Please fit responses into the form fields below by being as concise as possible. If you truly need more space, include a summary response in the respective form field along with "see attachment for more detail" and include the additional information on an attachment. One attachment per employee and one attachment per supervisor only, please*

### Remote Work Request (the following is to be completed by the Employee).

Main Workplace Address: \_\_\_\_\_

Remote Work Address: \_\_\_\_\_

Supervisor's Name: \_\_\_\_\_

Supervisor's Title: \_\_\_\_\_

Reason for Request: \_\_\_\_\_

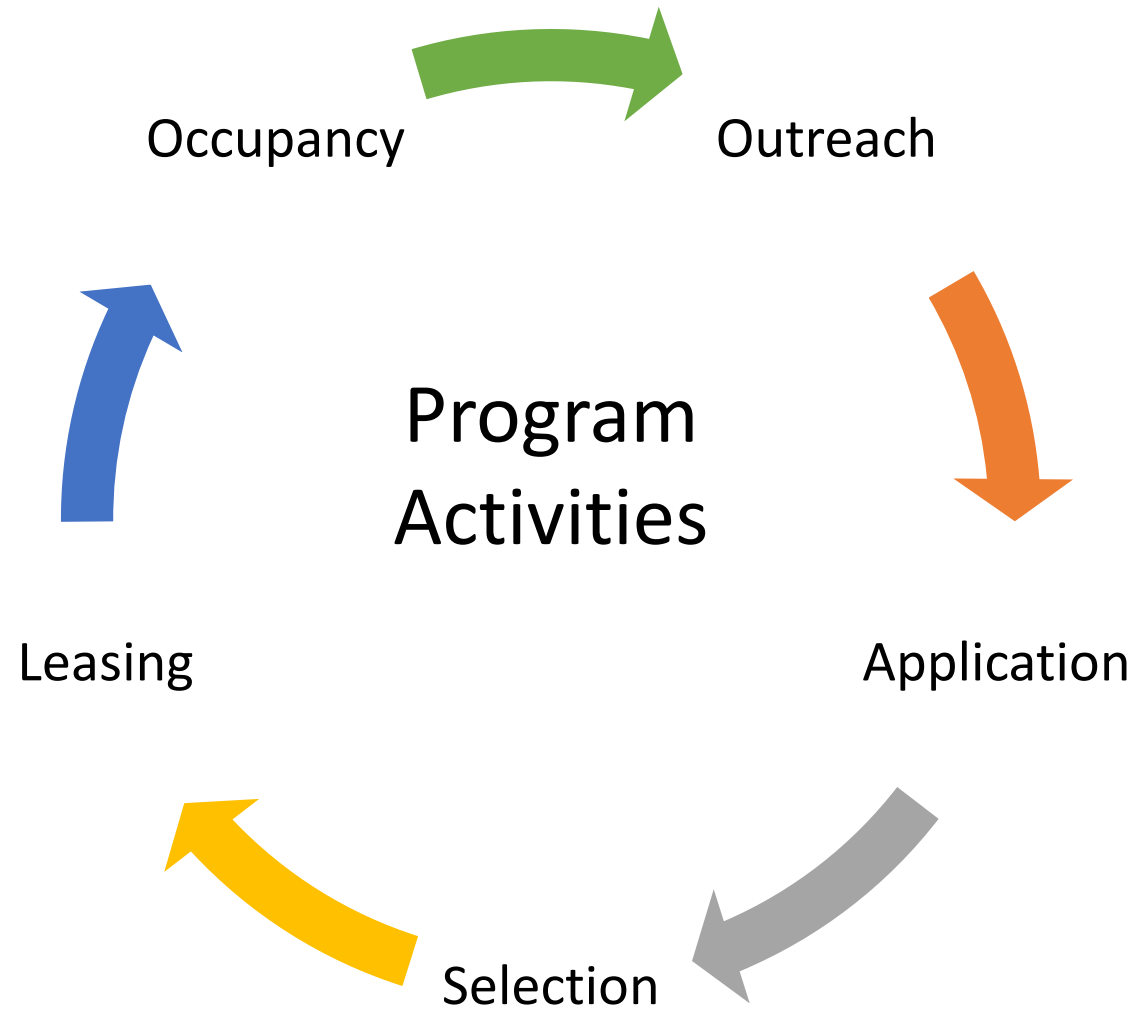
\_\_\_\_\_

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Link

# Routine Operations

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# Outreach

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Taken from HUD Exchange: <https://www.hudexchange.info/programs/housing-counseling/covid-19/>

# Counselors Provide Financial Assessment & Planning

- Housing Counseling can help households address their financial situation and avoid deepening financial losses and debts due to the COVID-19 crisis.
- Counselors assess the client's financial situation so they can begin the process of negotiating credit card payments and collections, addressing income, credit and debt issues, and student loan options and ensuring the client is safeguarded against fraud, scams and identify theft.
- Agencies are also offering virtual financial classes specific to those seeking financial security — searching for real-time information on how to maneuver the maze of financial products and services, establish or rebuild credit, reduce debt and save for the future.

# Assistance for Homeowners, Renters & the Homeless

- Housing Counselors work with lenders and landlords to negotiate mortgage or rent forbearance and eviction avoidance.
- Counselors work closely with the various lenders and communities of government and are knowledgeable of rules and regulations so they can offer first-hand experience to help advise clients of their options prior to entering into any agreement.
- Counselors will also help the client to understand the State/local foreclosure laws and how to navigate the current moratorium on foreclosures and evictions.
- Housing Counselors also coordinate with landlords, Continuum of Care (CoC) bodies and other social service providers to offer specialized rental and homeless counseling services to avoid eviction and ensure successful placement.

# Taking Applications

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Using websites to reduce office visits



# Northern Circle Indian Housing Authority

NCIHA

Home


About

Applications

Contractors

Careers

Staff Directory

NCIHA Facebook 

Rising Up From COVID - 19

## We Are Here To Help

With the introductions of the COVID 19 pandemic, we all felt the panic and fear as businesses began to lay off employees and unemployment became unresponsive. NCIHA received government funding, Cares Act, in 2020 to help tribal communities affected by COVID 19. In 2021, the Emergency Rental Assistance Program (ERAP) began funded by the US Department of Treasury that is assisting renters to make up past due payments and bills. We received confirmation that NCIHA will receive additional funds in the American Rescue Act, this will help both renters and homeowners affected by the pandemic, though a date has not yet been decided for when applications will be accepted. Check in regularly on our website and Facebook page for updates of COVID assistance.

<https://nciha.org/applications/>

# North Pacific Rim Housing Authority

[Website](#)



# Occupancy: Selections

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# Policy Revisions

Families may be reluctant to move during pandemic, and therefore it may be necessary to relax requirements for accepting offers

Preferences might need to be revised for families that are suffering from the impact of the pandemic

Homeless

Facing eviction or foreclosure

Overcrowded or substandard housing

Under Occupied housing units

# Policy Example: Spokane IHA

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# Selections: Over-income Households

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# COVID-19 Related Assistance for Non-Low- Income Families (PIH 2021-14)

- HUD has established alternative requirements to allow IHBG funds to be used to prevent, prepare for, and respond to COVID-19 through the following activities without regard to income limits or Indian status:
  - temporary shelter-in-place, isolation centers,
  - purchasing and making medical testing kits available,
  - purchasing and distributing masks and other personal protection equipment,
  - emergency food preparation and distribution,
  - cleaning and decontamination, and
  - other directly related activities.
- Permanent rental assistance, mortgage assistance, housing rehabilitation, and new housing construction may not be provided for the benefit of such otherwise ineligible families under this waiver and alternative requirement.

# Non-Low-Income Assistance Conditions

This assistance may only be provided to such otherwise ineligible families if:

- it is provided during the COVID-19 pandemic;
- it is designed to protect the health and safety of low-income Native American families;
- it is provided on an urgent basis (as documented by the IHBG recipient); and
- it is temporary in nature.

When providing this assistance, IHBG recipients must maintain records documenting that these criteria were met at the time that such assistance was provided.

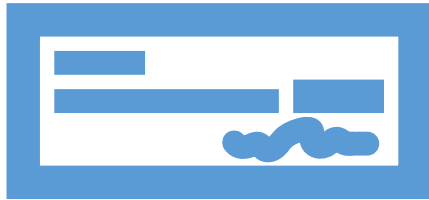


# Temporary Housing and Shelters

- Tribes/TDHEs may house low-income non-Indian families or over-income Indian and non-Indian families in NAHASDA-assisted units, including FCAS units, to shelter-in-place those families to protect the Tribal community from the further spread of COVID-19, regardless of income or Indian status.
- IHBG funds may also be used to provide temporary rental assistance to otherwise ineligible persons or families in privately owned units, hotels/motels, and similar facilities designed to shelter-in-place or isolate infected persons from others, if the criteria under this waiver and alternative requirements are met.
- The use of NAHASDA-assisted units, including FCAS, or funds for the temporary shelter-in-place or isolation of any individuals shall be temporary and no individual shall be isolated longer than medically necessary.

# Occupancy: Recertifications

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## Recertification Requirements

### § 1000.128 Is income verification required for assistance under NAHASDA?

- a) Yes, the recipient must verify that the family is income eligible based on anticipated annual income. The family is required to provide documentation to verify this determination. The recipient is required to maintain the documentation on which the determination of eligibility is based.
- b) The recipient may require a family to periodically verify its income in order to determine housing payments or continued occupancy consistent with locally adopted policies. When income verification is required, the family must provide documentation which verifies its income, and this documentation must be retained by the recipient.

# COVID-19 Waiver: PIH 2020-05 Section 13(d)

Applicable ONLY for FY 2020 IHBG and CARES Act

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Given the COVID-19 related challenges facing families seeking IHBG assistance, families currently receiving IHBG assistance that are due for income recertification, and Tribal and TDHE staff charged with verifying income and maintaining documentation, HUD is establishing the following alternative requirement under 24 CFR § 1000.128:

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1) IHBG recipients may deviate from their current written admissions and occupancy policies, and may allow less frequent income recertifications; and

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2) IHBG recipients may carry out intake and other tasks necessary to verify income remotely if the IHBG recipient or eligible families chooses to do so, including allowing income self-certification over the phone (with a written record by the IHBG recipient's staff), or through an email with a self-certification form signed by a family.

# If Policy Requires Recertifications



## **Option 1: conduct recertification remotely**

Mail or email form, to be completed and returned by mail or email.

Conduct by phone, documented by written record

Use online form or fillable PDF



## **Option 2: consider revising policies to stop requiring recertifications**

For all programs

For certain programs (homeownership, for example)

For certain families (elderly, for example)

# Housing Choice Voucher Annual Recertification

You should only complete this form if your certification specialist has contacted you and asked you to do so.

If you are receiving an error when trying to submit your form, try a different browser (Google Chrome, Firefox, etc.) or using a different computer/device.

## Program Type \*

If you do not see your program listed below, please go back to the AMHA main page and select the correct Annual Recertification for your program.

Select ▼

## AMHA Certification Specialist \*

Please select the employee that sent you the letter to complete this online form.

Select ▼

## Head of Household Last 4 SSN \*

## Head of Household First Name \*

# Retroactive Interim Recertifications

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- To prevent evictions for non-payment of rent, tribes may implement a policy to allow for retroactive interim reexamination if the family had a decrease in income but failed to report due to pandemic.
- The tribe may choose to establish conditions or requirements to maximize flexibility for when retroactive applications apply.
- For example, a tribe may adopt a policy that would make the effective date of an interim reexamination retroactive to the first of the month following the date of the actual decrease in income as opposed to the first of the month following when the family reported the change in income or when the interim reexamination was conducted.



# Policy Changes - Communications

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- Seek opportunities to streamline procedures for reporting changes to income. For example, tribes may relax verification requirements for reporting income reductions.
- Provide the ability for residents to submit a simplified income reduction form online and send proof of reduced income. Rents are then reduced without immediate documentation from the tenant.
- In addition, where the sole source of household income is lost, rents are reduced to the program's minimum rent or hardship rent.



# Outreach to families behind on payments

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- Identify the families who are behind on rent and determine the cause of non-payment. In tandem with this effort, identify the range of options and resources available to promote housing stability.
- Share information and discuss how families who are behind on rent can assess their eligibility for various resources.
- Key benefits that may enable families to catch up on rent include unemployment benefits, economic impact payments (commonly referred to as stimulus payments), tax refunds such as the Earned Income Tax Credit (EITC), utility assistance or payment plans, and local rent and utility assistance resources.
- Information on resources can be included with rent reminder notices, discussed at income reexaminations or rent conferences, and discussed as part of other direct outreach and one-on-one conversations with residents.

# Outreach to families behind on payments

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- Remind tenants that the federal economic impact payments (stimulus payments), income tax refunds, the \$300/week or “Extra” unemployment benefit, and the child tax credit are NOT included in their income calculation. There may be a concern among tenants that if they pursue an interim reexamination these income sources will be included in the calculation of income.
- Tribes and TDHEs may also consider using CARES Act funds to hire additional staff to respond to COVID-19, such as an Eviction Prevention Coordinator or Service Coordinator.

# Occupancy: Inspections

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# Inspection Requirements

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- NAHASDA does not speak to the scheduling and/or frequency of inspections; however, inspections are necessary to ensure that FCAS units are maintained as required in order to continue receiving subsidy.
- Because regulations do not address inspections, tribes/TDHEs must look to and follow their policies regarding inspection requirements.
- During the pandemic, it may be necessary to amend policies to provide some flexibility. For example, if policy states, “all units shall be inspected at least annually”, it may be preferable to say, “every effort shall be made to inspect every unit at least annually.”

# HUD Protocols for Inspections during COVID

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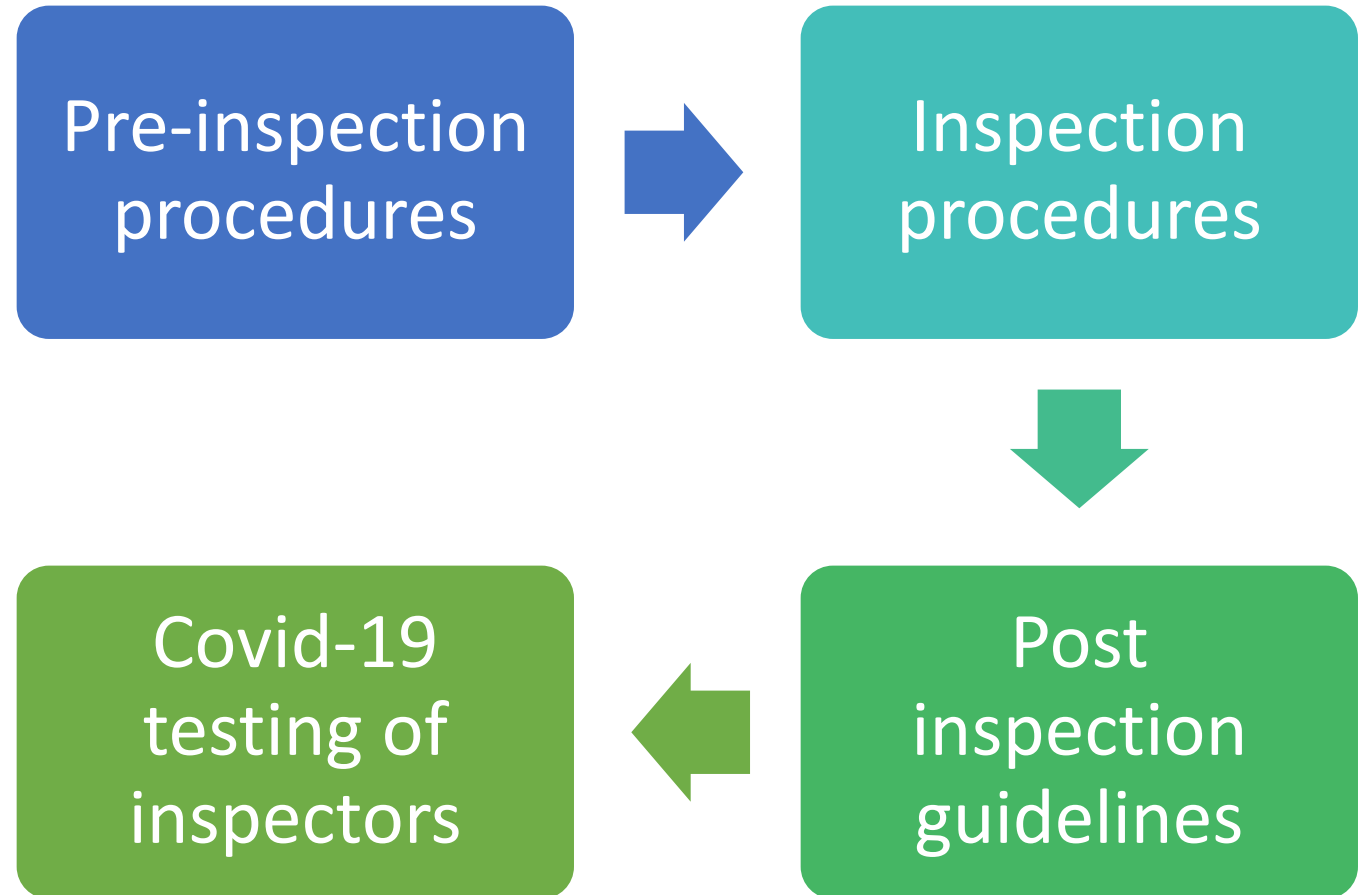
- The inspection of high priority/risk properties before other properties (existence of threat to health or safety of occupants);
- Evaluation of known property-specific health conditions prior to the inspection;
- Regular COVID-19 testing of inspectors and efforts to facilitate the vaccination of inspectors;
- Travel and quarantine guidelines for inspectors;
- Detailed operational protocols for inspectors' pre-inspection, during the inspection, and post-inspection reviewed by the CDC;
- Ability for residents to opt-out of unit inspections when inspectors arrive on-site.
- Additionally, under the CARES Act, tribes and TDHEs may purchase and make available to residents PPE, which HUD strongly encourages prior to an inspection.

# Using Real Estate Assessment Center (REAC) Inspection Guidelines

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- Due to the wide-spread health emergency associated with Covid-19, on March 16, 2020, REAC postponed physical inspections on all properties out of concern for the health, safety, and welfare of residents, and housing authority staff.
- Effective June 1, 2021, REAC expanded its inspections in support of the prioritized backlog of inspections.
- REAC Inspectors continue to follow CDC recommended guidance for travel, social distancing, the use of hand-sanitizer and the wearing of appropriate personal protective equipment (PPE) (e.g., wearing face masks and gloves) throughout an inspection.
- Tribe/TDHE may choose to use inspection guidelines and procedures established by REAC
- **The following are presented as an example and are not required**

# Inspection Procedures (see REAC Inspection Notice 2021-01)





# Pre-inspection procedures

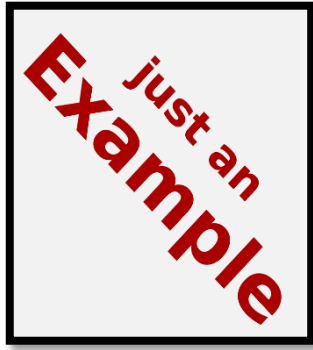
- Determine if uninspectable properties
  - Covid-19 cases on the property (multifamily building or single-family residence)
  - Property designated for the elderly or serves a majority elderly population (eliminated in most recent guidance; tribe may elect to continue designating these units as uninspectable)
- Determination made no more than 48 hours prior to scheduled inspections





# Inspection Procedures

- Personal Protective Equipment (PPE) is required to be worn throughout all phases of the inspection process. At a minimum, a properly fitting mask and pair of gloves must be worn throughout the inspection, even if local requirements are less stringent. For property inspections with an elderly population, a face shield is also required.
- Before entering each unit for inspection, the Inspector shall clean his/her inspection tools and equipment.
- Social Distancing - the Inspector shall maintain social distancing throughout the entire inspection.



# Post- inspection Guidelines

- Inspectors will conclude their inspection in accordance with the inspection protocol.
- After leaving the property, Inspectors shall dispose of used PPE and cleaning material as follows:
  - The Inspector shall dispose of his/her used gloves and cleaning material into an outside trash bag the inspector brings to the inspection.
  - Afterwards, the Inspector can close the trash bag and throw in the regular trash when the inspection is completed.



# Protocols for COVID- 19 testing of inspectors

- All unvaccinated inspectors must be tested for Covid-19 prior to their first inspection and every 30-days thereafter until otherwise directed by HUD. All certified inspectors shall maintain proof of a negative test result prior to an inspection for each inspection for a period of 24 months. This requirement is waived for fully vaccinated Inspectors.
- An unvaccinated inspector shall maintain proof of their latest test result and may be required to show proof that he or she fulfilled HUD's testing requirement the day of an inspection.
- Inspectors are prohibited from conducting an inspection after testing positive for COVID-19 until the Inspector tests negative following a positive result. If required by the tribe/TDHE, all Inspectors shall submit to an on-site temperature check.

# Occupancy: Taking Payments

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# In-Person Payments (cash or check)

- In-Person payments require that the family come into the housing office and make their payment, subjecting both the tenant and the staff person receiving the payment to COVID infection.
- This method can be used if there are steps taken to increase physical space between employees and tenants (e.g., drive-through service, physical barriers such as partitions) and by requiring that both the tenant and the staff person wear masks.

# Alternatives to In-Person Payments

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- Bank Transfers
- Payroll Deductions
- Per Capita Deductions





# Past Due Balances

Ensure all property management staff, rent re-certification staff, and service coordinators are aware that repayment agreements are an option and minimum rent hardship exemptions are mandatory.

Tribes can also encourage staff to include the policy in information sent to and discussed with residents. For example, property management staff may consider including this information with rent reminder notices.

# Repayment Agreements

- Consider reviewing and potentially revising the policy on repayment agreements. For example, due to COVID-19, you could possibly broaden the policy on repayment agreements, allowing residents to enter into a longer-term repayment agreement without the need to pay a lump sum.
- Amend repayment agreement language to include an exception for “extreme circumstances.”
  - *“Due to the extreme circumstance of COVID-19, the tribe is allowing residents to enter a longer-term repayment period without the need for a lump sum payment.”*
- Allowing a longer-term repayment period, and removing the lump sum requirement, provides additional relief to residents owing larger amounts.



# Conducting Virtual Meetings

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# Virtual Meeting Advantages

- Record and preserve BOC/Council meetings and archive them with approved minutes.
- Use multiple communication channels like audio, text, and video.
- Use electronic tools like polls and surveys.
- Keeps the BOC/Council connected during crises and all year long.
- Prevents disruption of leadership at times tribes/TDHEs need it most.
- Saves costs on travel, meeting rooms, printing costs, and time.
- Shortens meeting prep time.
- Allows online file-sharing.
- Makes it possible for more BOC/Council members to attend.
- Prevents disruption if BOC/Council members arrive late.
- There is less opportunity for side chatter.
- Can use breakout rooms to meet in small groups, committees, or task forces.
- Potential to use it for training employees, volunteers, or for BOC/Council training.
- Prevents having to reschedule BOC/Council meetings.
- Having meeting options is an incentive for BOC/Council candidates to serve.
- They're a green-friendly option that reduces the carbon footprint.

# The Challenges of Virtual Board Meetings



**INFORMATION  
SECURITY ISSUES**



**REDUCED  
ENGAGEMENT**



**TECHNOLOGICAL  
RELIANCE**

## OVERARCHING APPROACH

CLEAR COMMUNICATION

SET THE STAGE

- Use your existing method of communication to let board members know what to expect as you transition to a new way of convening.
- While this transition is necessary now, in the time of COVID-19, putting effective , secure virtual meeting practices in place has long term benefits.

## TIPS TO MAXIMIZE ENGAGEMENT

VIDEO

SHARE YOUR SCREEN

CLOUD DOCUMENT  
STORAGE

ATTENDANCE

SEGMENTED FEEDBACK

DIFFERENT VOICES

- Offer a video option (engagement is enhanced when video is added to the conference call);
- Remember to share documents that are being discussed with the other participants;
- Cloud document storage saves time because all relevant documents and board information are centralized in one location;
- Make sure to identify who is in the meeting. Give participants the opportunity to introduce themselves if time permits; Ask subsets of participants if they have questions;
- Give other participants the opportunity to conduct part of the meeting if appropriate.

# Implementing virtual meetings

- Implement flexible meeting and travel options (e.g., postpone in-person non-essential meetings or events in accordance with tribal, state, and local regulations and guidance).
- For BOC or Council meetings, ensure that allowed by Bylaws – make amendments if necessary
- Ensure that participants have necessary technology available
  - Laptop, desktop, or tablet (not smartphones)
  - Video camera
  - Microphone

# Future Management Considerations



# Future Housing Management Considerations

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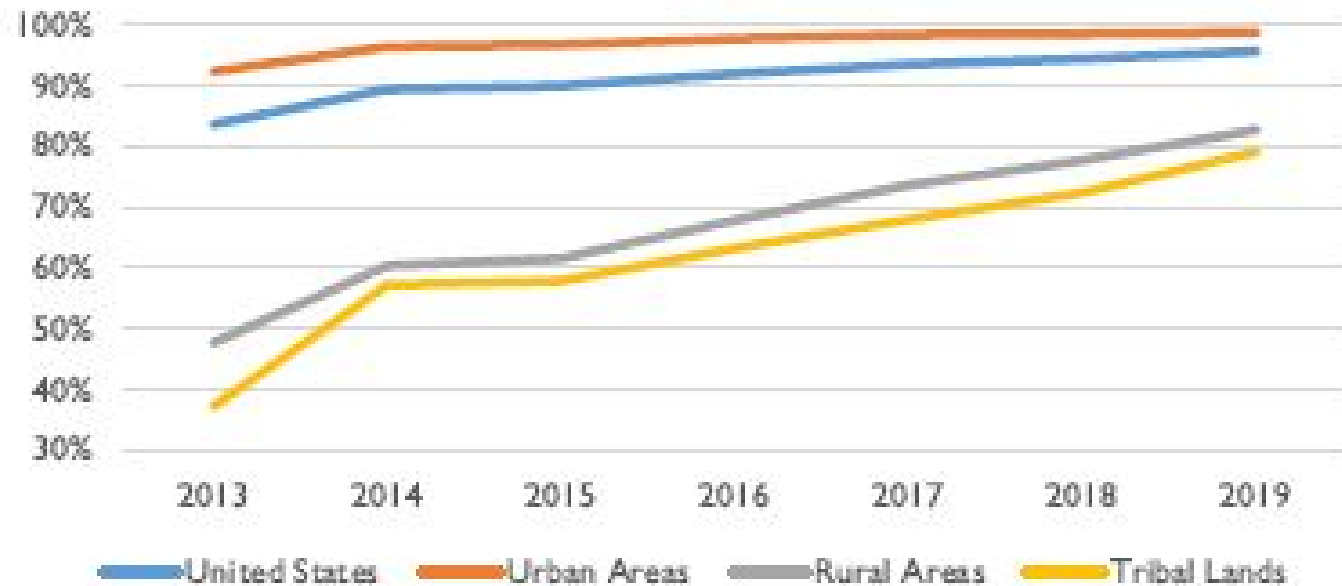
- Work now to improve broadband capability throughout your communities
- Develop occupancy standards
- Implement remote working policies
- Implement self-sufficiency programs
- Flexible work schedules
- Satellite offices for larger reservations



# Improve Broadband Capability

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Figure 3. Deployment of Fixed Terrestrial 25/3 Mbps Services



# Barriers to Broadband Deployment

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The U.S. Department of the Interior's (DOI) Office of Indian Energy and Economic Development (IEED) has identified seven fundamental barriers to deployment:

- lack of coordination,
- insufficient data,
- missing building blocks,
- insufficient funding,
- complex permitting,
- low adoption, and
- weak connection to economic development.



# National Tribal Broadband Strategy

- Published by BIA January 15, 2021
- Goal to eliminate the digital divide between tribal and non-tribal communities throughout the USA
- Outlines 28 recommended actions that agencies can take
- <https://www.bia.gov/sites/bia.gov/files/assets/as-ia/doc/2020.%20December.%20National%20Tribal%20Broadband%20Strategy%20FINAL-cover%20change.pdf>



# Develop Occupancy Standards

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- Inventory all housing
  - Identify Overcrowded Units: dwelling units too small for the family, for example more than 2 persons per bedroom (5 persons in a 2-bedroom house)
  - Identify Under Occupied Units: dwelling unit too large for the family, for example less than 1 person per bedroom (2 persons in a 3-bedroom house)
- Create incentives for persons to move to a home of appropriate size
  - Rent payment rebates
  - Pay for moving costs
  - Appliance rebates

# Additional Resources

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- [CodeTalk](#)
- [Indian Health Service COVID-19 resources](#)
- [HHS We Can Do This vaccine resources](#)
- [CDC Guidance for Businesses and Employers](#)
- [NIEHS](#)
- [CPWR COVID-19 protection planning tool](#)
- [AIHA Back to Work Safely](#)

# Questions and Answers



# Future Webinars

- Addressing Family and Individual Needs including providing food and hygiene items and educational support for youth, i.e., Internet, computers
- Accounting and Environmental related to documenting expenditures
- Best Practices