



# Memorandum

**To:** WCDA Multifamily Ownership and Property Management Stakeholders  
**From:** John Batey, Department Director, and Judy Koski, Compliance Officer,  
Affordable Housing Department, Wyoming Community Development  
Authority  
**Date:** 3/23/2020

**Re:** COVID-19 Threat and Affordable Housing Compliance in light of the threat posed  
by COVID-19

WCDA is issuing guidance on compliance for owners and managers. We want to emphasize that your first priority is the health and safety of your residents and staff.

To that end, we are making the following suggestions which offer alternative ways for applicants/residents to fill out and sign paperwork and submit the forms to you.

- You can collect forms electronically, by postal mail, or by having folks drop off paperwork at your office or another location.
- It is acceptable for applications and re-certifications to be signed electronically.
- If you encounter a problem getting an applicant or resident to sign a required compliance form, please email Judy Koski [koski@wyomingcda.com](mailto:koski@wyomingcda.com) and discuss the situation with her to try to come up with a solution.
- For compliance forms that require a manager's signature, have your managers sign the form after they've received it back from the applicant or resident. When signed, the manager should sign their name, put the actual date of signature, and the comment "Did not sign in the presence of applicant/resident due to COVID-19 risk."
- Managers can also sign forms electronically. Again, they should add a comment about not being able to sign in the presence of the applicant/resident due to COVID-19 risk. Keep track of any recertifications that are delayed due to applicants and residents not sending in their recertification documentation on time and complete them when you are able to. We understand there will be a lot of delays and there will be situations where you are unable to get verification of something because a third party is unable to respond.

March 23, 2020



- Do NOT evict residents based solely on their inability to complete the recertification process.
- Be sure you are making notes in your resident files to document which households' recertifications are being delayed as a result of COVID-19.
- Do not back-date recertification information or signatures. Sign off on documents and use effective dates that represent the actual dates you received information, signed a document and/or made a recertification effective.
- Implement inspection and unit turn policies that make the most sense for you operationally and in light of the populations you serve. Do not penalize tenants who refuse to allow you to enter their units for an inspection.
- We understand there are going to be significant vacancies and offline units in 2020 as a result of COVID-19.
- Again, please keep track of all your extended vacancies and units that are offline throughout the year. Make sure you keep comprehensive notes about which units were vacant/offline as a result of COVID-19 and when/if they were leased or finally made rent-ready.
- At this time, WGDA has suspended property inspections around the state. We are hoping these inspections will begin in July. When we have more information, we will alert all our stakeholders.

For the time being, the health and safety of your residents and staff are your first priority, not compliance. We have not yet determined how or if we will report noncompliance which occurs as a result of the disruptions caused by the virus but are hoping for guidance soon from the IRS and HUD which will permit accommodations in the required reporting.

In the meantime, please implement policies and practices that are primarily designed to reduce the spread of COVID-19. We will keep our stakeholders updated if/when our guidance changes or we receive new information from the IRS.

If you have additional questions or concerns, please reach out to Judy Koski [koski@wyomingcda.com](mailto:koski@wyomingcda.com)

Judy is currently working from home, but will respond as quickly as possible. Thank you for your cooperation and for your diligent assistance as we work through these trying circumstances.