Going L.E.A.N. To Innovate During a Pandemic

Rhode Island Housing
Special Achievement: COVID-19 Response

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COVID-19 RESPONSE
As an agency, we are not afraid to admit that fulfilling our mission during the COVID-19 health crisis has proven challenging. But we’re proud to note that the challenges have not prevented us from achieving our mission or from continuing to develop and roll out new programs. We’ve made significant changes to the way we work in order to meet the needs of Rhode Islanders impacted by COVID.

In three months, with the majority of our employees working remotely, we’ve been able to remain open for business, responding to thousands of calls, emails and inquiries from customers, partners, elected officials and the general public—all looking for resources and support. During this time, RIHousing has continued to invest, to help developers build, to help people buy, to keep people in their homes, and to direct countless Rhode Islanders to the resources they need.

HOW GOING LEAN HELPED US SUCCEED
While no one could have predicted the challenges we would face in 2020, RIHousing was fortunate to have recently completed a comprehensive, multi-year LEAN process in our Leased Housing and IT departments. The LEAN effort pushed us to re-think our work through the lens of creating efficiencies, reducing redundancies and being the most impactful in our work.

Before the COVID-19 health crisis hit Rhode Island, we had already committed to eliminating wasteful practices and improving efficiency. As part of our LEAN efforts, we spent a considerable amount of time reviewing all programs, processes, protocols, technologies and practices relating to our asset management and renter services programs. We viewed LEAN not just as a way to reduce costs, but as a way of thinking and as a long-term approach to how we operate vs only a short-term solution.

STREAMLINING PROCESSES TO SUPPORT PROPERTY MANAGERS/AGENTS AND TENANTS
Working with state and federal partners, RIHousing staff developed streamlined processes and creative ways to administer millions of dollars in federal funding while supporting over 17,000 residents and countless landlords and property managers. Staff were able to implement a number of processes to reduce the administrative burdens on landlords, tenants and property managers, including allowing owner certification of units, alternative verification of repairs to units, and voucher extensions where needed.

Using a variety of techniques and technologies, in just 3 months, we’ve been able to:

- Upon the onset of COVID-19, immediately establish and implement a remote file review process for all LIHTC compliance audits, allowing monitoring reviews to continue as previously scheduled (physical inspections were postponed)
- Upon the onset of COVID-19, establish and propose (in March) remote Management Occupancy Reviews (MORs) to HUD for our PBCA portfolio. Our proposal was recognized by the Boston HUD office and was recommended to HUD headquarters as a model that could be replicated throughout the country. HUD ultimately issued a moratorium on all MOR’s until this month (June 2020). The moratorium has recently been lifted and we were able to resume MOR’s immediately using the model designed in March. Many other PBCA’s have not yet reinstated MOR’s as most are now engaged in developing internal procedures. We have shared our remote MOR plan with a number of our HFA colleagues.
- Establish a dedicated webpage for multifamily owners and managers. This page contains links to RIHousing and Federal COVID-19 related guidance and continues to be updated regularly.
Design an electronic reporting system for owners and managers to communicate all known COVID-19 cases at their properties. Collected data has been summarized and provided to our Executive Director for her monthly report to the RIHousing Board of Directors.

Design and facilitate an online survey related to the cooling amenities at multifamily properties. Data from this survey is being used by various state agencies to assist in designing programs to aid residents (particularly elderly) with securing cooling systems in their living units.

ChatBot application to provide automated customer service to PBCA families

Additionally, for our Housing Choice Voucher Program, we’ve utilized technology to develop:

- A fully electronic certification system for our HCVP families
- An online portal for our HCVP Owners/Agents to update payment account information and get reports on payments issued to them
- Full utilization of HUD’s streamlining rule and waiver options giving PHAs discretion to reduce recerts and inspections:
  - Biannual HQS inspections – only for new, empty units
  - Use of waiver notice to streamline income verification process
  - Expedited recertifications for families with income reductions
- Since closing our offices to the public, we worked with limited staff on the HCVP side and managed to complete interims for income changes for almost 12% of the families participating in the program
- Live online Chat with HCVP landlords and tenants

**BOLD AND INNOVATIVE RESPONSES TO CHALLENGES OF COVID**

While we’re proud of the fact we’ve been able to roll out so many effective responses to the challenges created by COVID-19, we want to share a bit more details about one in particular:

**MOR POLICY:**

We consider our new MOR policy to be one of the most innovative and bold changes we’ve made. As part of our LEAN efforts, Leased Housing staff had been working with our IT department to develop remote MORs prior to COVID-19 in response to HUD’s draft notice from late 2019. Fortunately, we had begun this process earlier this year, prior to HUD’s suspension of in-person MORs.

This put us in a position to quickly finalize a number of tools and technical solutions to allow us to continue the business of conducting MORs during these unprecedented times. We developed the following materials and presented them to our HFA and industry peers, as well as representatives from our regional HUD office:

- RIHousing interim MOR policy
- Screenshots to SharePoint site
- External guide to the SharePoint guide
- Employee guide to the SharePoint guide
- SharePoint site correspondence for Owners/Agents at roll out

**ENSURING DATA SECURITY AND INTEGRITY**

Knowing that data security would be of the utmost importance as we transitioned to remote MORs, staff worked closely with our IT and data security staff. RIHousing’s SharePoint site is hosted on Microsoft’s secure Azure Government Cloud, which offers security, protection, and compliance services generally suitable for government purposes. Particular security features include data encryption; virus
detection; and control of access, permissions, and sharing. Azure Government uses datacenters and networks located in the U.S. only.

**IMPACT TO DATE**

While many other HFAs/PBCAs may have been reluctant to pursue remote MORs, due to data and technology capacity as well as confusion over interpretation of HUD rules, we moved forward with implementation earlier this month.

With 179 contracts in our PBCA portfolio, and an average of 9-10 MORS each month, remote MORs allow RIHousing the ability to significantly reduce the staffing needed to conduct these specialized reviews (typically, 2-3 staff may conduct on-site MORS, with remote, we can cut this down to one staff person). We can reallocate staff to the management of our portfolio and during the health crisis, we are effectively ensuring the safety and protection of our employees, management staff and tenants, especially as many of our developments house the elderly. **We’re most excited to share that staff were conducting 9 MORs/per month at this time last year and even during these challenging times, we’re now doing 11 MORs/month and soon expect to be able to increase that even further to 13/month! And we’ve done this utilizing existing capacity and technology—with no additional cost!**

**RESPONSE**

Property staff have been incredibly receptive to remote MOR policies as it allows them to continue MORs while limiting staff exposure. Additionally, our online SharePoint site was developed to also allow us to better service properties in our portfolio as we will also allow uploads of annual files, tenant selection plans, etc. to the site.

We are proud to note that our protocols and policies have received high marks from the regional HUD office, who have noted that our MOR policy helps us to keep staff and residents safe while still fulfilling our obligation to conduct reviews under the PBCA ACC Contract. The effort uniquely positions us for a post-COVID world as there will likely be trepidation in the industry about visits to properties. We are now prepared to navigate future challenges as a result of this initiative and agency resourcefulness.

RIHousing was fortunate to have a strong foundation in place, and strong leadership from our Board of Commissioners, to allow us to be responsive to the changes and challenges currently faced. The last three months have shown us just how flexible and innovative we can be during these unprecedented times. We’re proud that we’ve lived up to our mission and have continued to support thousands of Rhode Islanders through these difficult months.

**WHY IT’S AWARD-WORTHY**

- **Are innovative:** our new remote MORs for PBCA properties establishes a new model to respond to the challenges created by COVID-19
- **Respond to an important state need:** responds to many of the challenges created by COVID-19
- **Achieve intended results:** we are able to continue to administer millions of dollars in federal rental assistance programs and meet our oversight and administrative duties all while keeping staff, managers/agents and tenants safe
- **Provide benefits that outweigh costs:** we were able to utilize existing staffing and technology to deploy these new efforts
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Remote MORs

SharePoint User Guide and Information for Owners and Agents

To ensure success of remote MORs, Leased Housing staff developed a series of user guides and informational materials for Owners and Agents.
Dedicated COVID-19 webpage for multifamily owners and managers allows us to share information, updates and resources to this audience.
Series of e-newsletters

Series of e-newsletters with important updates and in formation.

Rhode Island Housing and Mortgage Finance Corporation (RIHousing) is the allocating agency for the low-income housing tax credit (“LIHTC”) for the State of Rhode Island. As the allocating agency, RIHousing is responsible for administering the LIHTC program in compliance with the requirements of Section 42 of the Internal Revenue Code (the “Code”).

In 2014, the Internal Revenue Service (“IRS”) issued disaster relief guidance through IRS Revenue Procedure 2014-49 (the “2014 Revenue Procedure”). This revenue procedure provides the ability to extend the statutory deadlines for the 10% test and placed in service dates, and to waive certain physical inspection requirements of the IRS compliance monitoring regulations.

The four provisions specific to the allocation of LIHTC in the 2014 Revenue Procedure are:

- Provide a 6-month extension of the 10% test deadline for carryover allocations as required by IRC Section 42(h)(1)(E)(i) and IRS regulation 1.42-6.
- Provide a 12-month extension of the 24-month minimum rehabilitation expenditure deadline as required by IRC Section 42(c)(3) and IRC Section 42(e)(4).
- Provide a 12-month extension of the placed in service deadline as required in IRC Section 42(h)(1)(E)(i).
- Provide at minimum a 12-month extension of the 25-month rehabilitation period currently allowed under IRS Revenue Procedures 2014-49 and 2014-50 to properties that suffered a casualty loss due to a Presidially declared major disaster in the 25-month period prior to the onset of COVID-19. State Housing Credit agencies should be allowed to set restrictions within this period.

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In these difficult times, many Rhode Islanders are facing uncertainty around their housing situation. We know that you too are hearing from residents who are worried about being able to make their rent or pay their mortgage in the coming months.

We wanted to provide several updates to you and let you know how RIHousing is working to provide assistance where we can and to share information on resources that may be helpful for Rhode Islanders. This information is also available on RIHousing’s COVID-19 Response webpage. As these resources may change, we will reach out to provide important updates as needed.

Although RIHousing’s offices are closed to visitors, we have a team of staff on site and others working remotely to minimize any disruptions in service for our customers and partners. Staff are available by phone or email and Rhode Islanders seeking housing help can call 401-457-1234 or email scheduling@rihousing.com for further assistance.

RIHousing is committed to helping residents navigate these housing challenges in the coming months.

Please do not hesitate to reach out if we can be of assistance.

HOMEOWNERS

- RIHousing Mortgage Customers experiencing a financial hardship due to COVID-19 are being offered forbearance of their mortgage payments. Additional information can be found on the COVID-19 RIHousing Mortgage Assistance page.
Site Reporting

Electronic reporting system for owners and managers to communicate all known Covid-19 cases at properties.

Collected data has been summarized and provided to senior management and partners.

The success of these efforts would not have been possible without the team effort that went into collecting Site Contact Information earlier this year. Management agents were provided with an online form to submit their current contact information.

Without this tool (which took much effort to complete after most of the team was sent home in March), we wouldn’t have the comprehensive dataset that can be easily updated. We share the link to the tool via emails as well as posting to our agency website, allowing for “real-time” reporting and updates. Previously, we had to shuffle through property-specific files for that contact information if we weren’t familiar with the property.
Designed and facilitated an online survey related to the cooling amenities at multifamily properties. Data from this survey is being used by various state agencies to assist in designing programs to aid residents (particularly elderly) with securing cooling systems in their living units.

Fully electronic certification system for our HCVP families
Online portal for our HCVP Owners/Agents to update payment account information and get reports on payments issued to them.
Online Tools

Live Online Events for HCV Landlords and Tenants
In lieu of in-person meetings and trainings, we launched “live” online Chats for HCVP landlords and tenants with members of our Leased Housing team available to answer questions.