

COVID-19 Supplemental Payment Request

HUD Form 52671-E

Tips and Explanations

(Updated December 2022; Round V edits shown in red)

Technical Tips

- To ensure full functionality, use of Adobe Reader, Chrome, or KoFax Power PDF is recommended.
- 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.
- Automated calculations in the form are completed in sequence. For example, the automated answers generated on Question 25 will not be accurate until all owner entries for prior sections are complete.
- All submissions should be on the final OMB-Approved form. Please use the updated form posted on the [HUDCLIPS](#) section of hud.gov. Owners should not use any previously available versions of the form as they do not reflect policies and directions for **Round V, this includes any versions marked “DRAFT”**.
- 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 2022-06](#) 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 IX.

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. 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 **January 31, 2023**, though amounts may be limited based on the properties current financial position. Properties that previously received a CSP of any amount for expenses in a prior operating period may request funds for additional eligible costs as an “Amendment”.
- Requests for expenses incurred prior to April 2021 and requests exceed the *Standard CSP* amount (for any Operating Period) must demonstrate a “critical financial need” for the funds. See *Financial Need* section below.
- **IMPORTANT, no assessment of property financial position is required if requesting funds less than or equal to the *Standard CSP* amount for expenses incurred in Operating Periods 4 or 5. All properties are encouraged to consider if they have expenses qualifying for *Standard CSP* reimbursement, even if they have surplus cash.**
- **For Round V, there is no requirement for Section 8 properties to limit future surplus cash distributions when receiving a CSP, but the maximum request amount is tied directly to a property’s current financial position.**

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

- **Operating Period:** You must indicate whether your request is for expenses in the 1st Operating Period (March 27, 2020 to July 31, 2020), 2nd Operating Period (August 1 to November 30, 2020), 3rd Operating Period (December 1, 2020 to March 31, 2021), 4th Operating Period (April 1, 2021 to October 31, 2021), **5th Operating Period (November 1, 2021 to January 31, 2023)** or combines expenses from multiple operating periods.
- Requests covering multiple operating periods can be combined on one form, but it may be advantageous to separate certain requests to avoid triggering the additional requirements associated with request exceeding the *Standard CSP* amount (see Section VI of the Notice). **If you tabulate expenses for multiple Operating Periods and find they collectively exceed the *Standard CSP* amount, consider breaking-out the expenses for each Operating Period on separate CSP forms to allow each to be processed as a *Standard CSP*.**
- **For a combined request, you may be prompted to type-in which Operating Periods are covered. Enter each numeral, with a comma to separate, e.g. 1,3,4,5.**
- If any prior payment was approved for an Operating Period for which additional funds are now being requested, the “Amendment” checkbox must be marked in the header section and the amount of the prior payment must be provided. If a prior request was done through a Combined Operating period request, the owner must break-out the amount associated only with the Operating Period for which the additional amount is now being requested.

Parts I and II: Amounts Requested

- All requested amounts must be captured in Part I and/or Part II of the form.
- Read section V of Notice H 2022-06 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.
- 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 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 have been provided separately. Eligibility validation will occur based on performance reporting submitted through *Standards for Success* or IWISH grant reporting mechanisms. Note, CSP cannot be requested for any cost increases previously reimbursed from IWISH grant funds.
- Expenses reported under *Eligible Capital Expenses* may include equipment purchases, as well as installation costs.
- All respondents must answer the checkbox question under line 17 that asks if equipment included on lines 13-16 has been delivered and installed. If no funds are requested for *Eligible Capital Expenses*, owner should mark “N/A”.
- **Line 18 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.**
- **An owner may not include expenses in Parts I or II that total to an amount exceeding the Standard CSP OR any expenses from Operating Periods 1,2, or 3, if these amounts are not justified by the property’s current financial position. (See further discussion below on pages 5-6)**

Part III: *Standard CSP Amount*

- The purpose of Part III is to determine whether the requested amount needs to be evaluated as either a *Standard CSP* or a request exceeding the *Standard CSP* amount. If line 18 is less than or equal to Line 24, then the request is categorized as a *Standard CSP*. If the amount on line 18 exceeds line 24, then the request must meet additional requirements in order to be fully funded.
- If the property does not meet all criteria for a larger request exceeding the *Standard CSP* amount, then owner should ensure amounts requested (Part I/Part II) are equal to or less than the *Standard Payment* amount on line 24.
- Please be sure to review definitions in Footnote 8 of **Notice 2022-06** for types of properties that are eligible for the increased “elderly property” allocation of \$1,000.
- The Line 23 Service Coordinator allocation is the lesser of \$1,250 or the service coordinator request showing in Part 1, Subtotal II. The cap cannot be increased by more than the actual eligible service coordinator expenses that were incurred.

- **For Round V, the maximum amount for a *Standard CSP* is \$25,000, which may be lower than the unit-based calculation for our largest properties.**
- If the total request (line 18) is less than or equal to the *Standard CSP* amount (line 24), an owner does not need to complete Part IV. Skip ahead to Part V of the form.
- Fields under Line 25 are automatically populated based on amounts entered by the owner in prior sections.

Part IV: Requests Exceeding the Standard CSP Amount

Expense Documentation/Justification

- All requests that exceed the *Standard CSP* amount 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. This also applies to CSP Amendments that when added together with the previously paid CSPs for the Operating Period are above the current *Standard CSP* amount.
- Please make sure all documentation is well organized and clearly labeled.
- In addition, owners requesting amounts above the *Standard CSP* cap must provide a brief explanation in Box 26 of the conditions that necessitated the expenditures. Narratives should explain how COVID-19 risks at the property justify the higher amounts requested. This may include the number of residents reporting infection, any required quarantines, known exposure at the property, community infection rates, and local health directives and must describe specific activities taken in response to such conditions.
- In general, justifications should explain how COVID-19 impacts relate to and justify the expenditures for which the CSP reimbursement is now being requested.
- **For CSP Requests that exceed the *Standard CSP* and include *Eligible Capital Expenses*, complete box 27 with a description of the property improvements completed (or contracted), including a list of any major building components that were replaced or improved. Additional information may be needed in the narrative dependent on the type of expense (see page 22-23 of Notice H 2022-06). A good narrative will tie improvements directly to CSP eligibility criteria. For example, stating that included number of Wi-fi access points are the minimum needed to provide service to the targeted areas of the property.**

Financial Need Requirements and Justification

- **Properties requesting a *Standard CSP* for expenses incurred in Operating Period 4 and/or 5 only do NOT need to assess property financial position or availability of residual receipts prior to submitting their request. The availability of project funds is NOT considered by HUD in approving these smaller requests for recent expenditures.**

- Full compliance with financial need criteria in Section VIII of Notice H 2022-06 *is required* for all requests exceeding the *Standard CSP* amount AND for requests for any amount that are for expenses were incurred prior to April 1, 2021 (CSP Operating Periods 1,2, and 3).
- Section 8 owners that have recently taken distributions of surplus cash are generally not eligible for amounts exceeding the *Standard CSP* or for any payments for Operating Periods 1, 2, or 3. See page 17 of Notice H 2022-06 for details.
- Prior to submitting a request for funds exceeding the *Standard CSP* amount AND for requests for any amount that are for expenses incurred prior to April 1, 2021, the ownership must determine the project's net cash position. This involves calculating the property's surplus cash (or deficit) as of December 31, 2022, with downward adjustments for any CSP eligible expenditures in January 2023 and inclusion of certain CSP-related debt that would not typically be included in the surplus cash calculation. For general information on surplus cash calculations, please see Chapter 2 of HUD Handbook 4370.2 and page 18 of Notice 2022-06 for additional allowable adjustments under CSP. In general, a larger CSP can be requested to allow a property to break-even, not to create profit/surplus cash. Calculations of deficits that justify requests above the *Standard CSP* must be documented by the owner and kept on-file with the property's financial records.
- Some owners will be required to submit additional property financial records and to complete the Financial Need Justification section of the form to support a larger CSP request. Properties showing a net positive cash position (surplus cash) on their most recent AFS or submitted surplus cash calculation must also submit a compelling explanation of recent changes in financial position to justify necessity of the CSP (Box 28). See Section X of Notice H 2022-06, pages 21-22, for additional details.

Part V: Other Information and Owner Certifications

- Please read the Owner Certifications and Acceptance of Terms 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 text for the owner certification and acceptance of terms is as follows:

Owner's Certification and Acceptance of Terms:

I certify that:

(1) The requested payment was computed in accordance with HUD's Housing Notice 2022-06. It reflects only expenses incurred during the operating period(s) specified for eligible activities and purposes.

(2) The property and ownership are in good standing with HUD, as defined in Section IX of Housing Notice 2022-06.

(3) No amount included on this funding request has been paid from other forms of governmental or philanthropic assistance provided to address the impacts of COVID-19 or previously reimbursed from a HUD residual receipts account governed by a Section 8 HAP, or by an FHA or Capital Advance regulatory agreement.

(4) If requesting funds that exceed the *Standard CSP* amount for the property (line 24) or requesting any amounts for expenses incurred before 4/1/2021, I have considered available project funds and determined a larger CSP reimbursement is needed to address project operating needs.

(5) If requesting funds that exceed the *Standard CSP* amount, or requesting any amounts for expenses incurred before 4/1/2021, the amount of my request does not exceed the amount needed to address the operating deficiency calculated for the property, or, the total CSP- eligible expenses for the specified CSP Operating Period(s), whichever is less. The operating deficiency calculation reflects the property's net cash position as of December 31, 2022, modified to include the allowable adjustments for CSP- eligible expenses and debt that are indicated on page 18 of Housing Notice 2022-06 (which may include January 2023 transactions).

(6) Where required by Section IX of Housing Notice 2022-06, I agree to deposit amounts received as reimbursement for *Eligible Capital Expenses* in the project's Reserve for Replacement account.

(7) If requesting funds for *Category B Eligible Capital Expenses* (line 17) all equipment for which CSP is requested has been delivered and installed or is under contract to be delivered and installed no later than 10/31/2023. I understand I must provide certification of completed installation and final costs prior to receiving a disbursement of CSP funds for any *Category B* equipment that is not installed at the time of this request.

(8) 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.

(9) 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. I, the undersigned, certify under penalty of perjury that the information provided in this form is true and correct. *WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802)*