

Rental Assistance – Takeaways as of Jan 8, 2021

Still several unknowns

- Overall, expecting similar speed bumps to the CRF
 - Administered by treasury, w/ OIG and general counsel involved again. Lots of career folks fortunately
 - FAQs/guidance to come
 - Eligible expenditure certification similar to CRF
 - GFAO begs everyone to send questions to THEM, not Treasury, to avoid chaos
 - Need a definition for “obligation” (lesson learned from CRF). September 30th deadline to obligate, else funds get reallocated.
- Money flow
 - Tenants and landlords can both apply, but the jurisdiction needs to try to give directly to landlord first, and only if that's unsuccessful go to the tenant. Unclear how exactly this will be implemented!
 - There will need to be safeguards to prevent duplicate applications on behalf of the same tenant
 - A major point of ambiguity is how the fund can be used for utility/energy costs. Very ill-defined in the statute.
- Eligibility
 - "Other" eligible expenses need to be defined
 - “Other evidence” of housing instability needs to be defined
 - Statistical concerns (how AMI is defined, SMI can be substituted, etc.)
 - Concerns about household income verification. Not clear what evidence is needed. HUD methods? PHA methods? Self-attestation? This may be a challenge
 - What counts as a disqualifying federal housing assistance program? What about if they got money from CRF? LIHEAP?
- Some concerns about “housing services” and admin expenses being lumped together. This probably happened as a last-minute adaptation from the other bill, indicative of a potential point of confusion.
- GFAO says a lot of folks set up rental assistance programs through the CRF, so there are questions about how continuity might work, and if grantees might be able to make things seamless. How would the 12-month limit work for someone who has already been receiving CRF \$ for rent?
- Fed. Administration transition is hanging over all of this. New admin comes in on the 20th, and funds must be distributed by Jan 26th
- Biden admin is expected to address expiring eviction moratorium before End of Month.