

Pandemic Rent program in VT	RHSP (CRF)	Emergency Rental Assistance Consolidated Appropriations Act
Dates of program	7/13/2020 – 12/31/2020	[Eff date] – 12/31/2021
Amount of money	Vt used \$25MM of \$1.25 billion	Vt gets \$200MM of \$25 Billion
Source of money	US Treasury Dept → Vermont treasurer → Legislature appropriation	US Treasury Department →?
Law	Vermont: Act 137; Sec. 11 (a)(4) Federal: H.R. 748, title V Sec. 5001	Vermont? Federal: HR 133 Division N Title V Subtitle A Sec. 501
purpose	Vt: “To distribute funds to landlords on behalf of tenants.”	Fed: “provide financial assistance and housing stability services to eligible households” Sec. 501(c)(1)
Eligibility	<u>past due rent</u> [eligibility established by] -missed rental payments and are at risk of eviction, or -otherwise show proof of a demonstrable need for rental assistance. and [-monthly rent at or less than] VSHA payment standard <u>Future rent</u> (M2M) -reason	501(k)(3)(A) one or more individuals in HH (i) has (I) qualified for unemployment benefits or (II) experienced a reduction in household income, incurred significant costs, or experienced other financial hardship due, directly, or indirectly, to the novel coronavirus disease (COVID–19) outbreak, which the applicant shall attest in writing; (ii) . . . the household can demonstrate a risk of experiencing homelessness or housing instability, which may include (I) a past due utility or rent notice or eviction notice; (II) unsafe or unhealthy living conditions; or (III) any other evidence of such risk, as determined by the eligible grantee involved; and) (iii) the household has a household income that is not more than 80 percent of the area median income for the household. And (exception to the above)
Eligibility Income limit		501(k)(3)(B) any rental assistance provided to an eligible household pursuant to funds made available under this section is not duplicative of any other Federally funded rental assistance provided to such household.
Eligibility, continued		501(k)(3)(C) (i) Income determination either: (I) HH income for 2020 or (II) HH income at time of application (ii) those in ¶ (II) Subject to redetermination every three months
Income eligibility determination		

Pays for	<p><u>Grp 1 and 2 Past due rent</u></p> <p><u>Money to Move</u> (first, last, security, rent through December 2020)</p> <p><u>Stipulations, 4773, MTD:</u> past due rent, court costs, attorney's fees, [damages.]</p>	<p>501(c)(2)(A) financial assistance to eligible HH</p> <ul style="list-style-type: none"> i) rent; ii) rental arrears; iii) utilities and home energy costs; iv) utilities and home energy costs arrears; and v) other expenses related to housing incurred due, directly, or indirectly, to the novel coronavirus disease (COVID-19) outbreak, as defined by the Secretary. <p>501 (c)(2)(A) For 12 months plus 3 months if necessary to maintain stability of prospective rent based on application and based on availability of funds</p> <p>501(c)(2)(B) cannot pay prospective rent until rent arrears have been paid</p>
Pays for		Housing Stability services 501(c)(3)
Payment method	Direct deposit to LL account	Direct payment to LL or utility unless they refuse, then to HH 501(c)(2)(C)
(j) TREATMENT OF ASSISTANCE		501 (j) Payment does not count as income to tenant for purposes of federally funded benefit programs
Tenant protections:	<p>Waive late fee</p> <p>Waive excess of payment standard</p> <p>Cease eviction</p> <p>Drop any cause to date</p> <p>No non-payment for x months</p> <p>RHHC compliance in 30 days</p> <p>No payment for life-safety</p>	
Manner of application	<p><u>Group 1:</u></p> <p>Tenant application/landlord certification</p> <p><u>M2M: joint LL/T</u></p>	501(f): Landlord can assist or apply on behalf of tenant but must obtain tenant's signature and must provide documentation and apply to tenant's account
Prioritization of Applications		<p>501(c)(4) (A)Prioritization of applications</p> <p>-50% AMI</p> <p>Or</p> <p>-Unemployed for 90 days</p> <p>[And]</p> <p>501(c)(4)(B)</p> <p>"nothing shall prohibit prioritization of"</p> <p>-unable to reach place of employment due to COVID-19</p> <p>-place of employment closed due to COVID-19</p>

Reallocation of unused funds	CRF funds must be spent by 12/20	501(d) Beginning on September 30, 2021 the Secretary shall recapture excess funds, ... not obligated by a grantee . . . and the Sec shall reallocate [to other grantees], at the time of such re allocation, have obligated at least 65 percent of the amount originally allocated
Reporting		501(g)(1) Must report quarterly on: # eligible HH getting assistance Acceptance rate of applicants Types of assistance provided to each HH Average \$ amount per each HH HH income level 30% AMI or less Between 30% AMI and 50% AMI Over 50% AMI but not exceeding 80% AMI # of month/payments 501(g)(2) disaggregated by gender, race, ethnicity of primary applicant of HH
privacy		Privacy and security 501(g)(4) (i)Of individuals and HH info (ii)personally identifiable information only collected for use in reports and (iii) confidentiality of Survivors of IPV
recoupment	CRF funds can be recouped	Violations of 501(c) may be recouped.501(h)(i)(2)