

# Rental Assistance Program Agency Implementation Guidelines



The Rental Assistance Program has been funded by the CARES Act and is designed to assist Utah renters whose ability to pay rent has been negatively impacted by COVID-19, but whose needs are not being met by other programs. Primarily this funding should assist those who are not eligible for unemployment benefits. This document provides a guide for how to utilize these funds in your communities. Please be advised that this assistance will go directly to the landlords.

## At-a-glance Reference

TO DETERMINE which funds an applicant qualifies for, please start with the chart below. First, use the applicant's Area Median Income (AMI) or Federal Poverty Level (FPL) to determine which particular allocation the applicant is qualified for. Second, ensure the applicant is eligible for assistance from specific eligibility requirements found under each fund's summaries (found on each corresponding page number). Third, compare available money in each fund and allotted funding with respect to each organization.

	Funds	Earliest Date	Arrearages Available	AMI/FPL	Tax ID	Page #
ESG	\$3,170,277	05/08/2020	***Yes — with some restrictions	Up to 50%	Yes	<a href="#">2</a>
HOME	\$1,000,000	05/04/2020	No	Up to 60%**	No; Driver license accepted	<a href="#">5</a>
CDBG	\$200,000*	04/01/2020	Yes	Up to 80% AMI	Yes	<a href="#">7</a>
CSBG	Varies by agency	05/08/2020	Yes	200% FPL	Yes	<a href="#">7</a>

*For additional requirements for each program, please refer to the Summary Funds Sheet.*

\*\$100,000 to Tooele County Housing Authority and \$100,000 to Weber County Housing Authority

\*\*The suggested threshold at 60% for HOME dollars concerning rental assistance is understood, but, as it currently stands from the table above, and since only Wasatch Front Regional Council is willing to use CDBG for the benefit, and we do not have confirmation, yet, on when the State will distribute its allocation, there is not much available for the 60%-80% AMI population

\*\*\* <https://www.govinfo.gov/content/pkg/CFR-2019-title24-vol3/xml/CFR-2019-title24-vol3-part576.xml>

# Rental Assistance Program (RAP)

## Eligibility (Applicants must meet at least one criterion)

1. Individuals who do not qualify for unemployment benefits.
2. Individuals who are working and have experienced pay cuts, but are not eligible for unemployment benefits and require assistance with housing costs.
3. Applicants that have applied for unemployment insurance, but have not received an approval or denial. If the applicant has shown that they have applied for unemployment benefits and are waiting for an approval or denial, they may apply for rental assistance. Agencies should contact the point of contact listed below to request expedited processing for applicants. If the applicant has not received notice of approval or denial within five business days, they may be considered eligible for housing assistance through RAP. If they are approved for unemployment benefits they will not qualify for housing assistance. If the applicant is denied for unemployment benefits, they may continue the application for the RAP. Agencies that have access to eShare for other programs may use their eShare access to see unemployment insurance information to assist determining applicant eligibility.
  - Point of contact(s) for status of unemployment claim:
    - ◊ Elias Wise: (801) 468-0140, Fax (801) 468-0211; email: ewise@utah.gov
    - ◊ Additional assistance – Sarah Moore: (801) 801-834-4609; email: smmoore@utah.gov
  - Needed information for claims:
    - ◊ Full name and last four digits of social security number or Tax ID number

Applicants must also be eligible for assistance based on relevant program fund guidelines. Households may qualify for up to \$1,500 in rental assisted funding. Please contact David or McKenna if there are extenuating circumstances that should be considered (larger families needing larger and more expensive housing, etc.).

\*\*\*THIS PROGRAMS PROVIDES THE BASIC REQUIREMENTS. IN ORDER FOR INDIVIDUALS TO QUALIFY FOR ANY OTHER RENTAL ASSISTANT FUNDS THEY MUST FIRST MEET THE QUALIFICATIONS LISTED ABOVE.

Applicants must prove ineligibility for unemployment or demonstrate eligibility based on program fund guidelines, e.g. those who are receiving unemployment benefits, but, even with adjustments, are not enough to cover rental housing cost burdens. Agencies that have access to eShare for other programs may use their eShare access to view unemployment insurance information, in order to assist in determining applicant eligibility, and expedite said process.

Unemployment Insurance												
UI Name :						Address : APT 2 118 S 1450 W CLEARFIELD UT 84015						
SSN : XXX-XX-XXXX						AKA :						
Regular Benefits												
Benefit Year Begin : January 19, 2020				Benefit Year End : January 16, 2021								
Weekly Payment : \$167.00				Amount Paid : \$2,057.00								
Balance : \$748.00				Direct Deposit : N								
Estimated Weeks Remaining : 4.00				Source for Search : CUBS								
Open Issues : 0				Claim Status : Flgible								
Payment History for the Past 30 Months												
Check Date	Benefit Week	Pay Type	Pay Amt	Stm Amt	Total Amt	Org. Earn	Cor. Earn	CSBgn. Date	CSEnd Date	CS Amt	CS Percent	OP Balance
May 10, 2020	May 09, 2020	PD	187.00	800.00	787.00	0.00	0.00			0.00	0.00	0
May 03, 2020	May 02, 2020	PD	187.00	800.00	787.00	0.00	0.00			0.00	0.00	0
Apr 27, 2020	Apr 25, 2020	PD	187.00	600.00	787.00	0.00	0.00			0.00	0.00	0
Apr 19, 2020	Apr 18, 2020	PD	187.00	600.00	787.00	0.00	0.00			0.00	0.00	0
Apr 14, 2020	Apr 04, 2020	PD	187.00	600.00	787.00	0.00	0.00			0.00	0.00	0
Apr 12, 2020	Apr 11, 2020	PD	187.00	600.00	787.00	0.00	0.00			0.00	0.00	0
Apr 05, 2020	Apr 04, 2020	PD	187.00	600.00	787.00	0.00	0.00			0.00	0.00	0
Mar 29, 2020	Mar 28, 2020	PD	187.00	0.00	187.00	0.00	0.00			0.00	0.00	0

## Documentation

- Individuals must provide a denial form from applying for unemployment benefits.
- History of loss of income
- Self declaration of change in economic status

## State Contacts



- David Fields: [dfields@utah.gov](mailto:dfields@utah.gov)
- McKenna Marchant: [mmarchant@utah.gov](mailto:mmarchant@utah.gov)

## CARES Act ESG (ESG-CV)

THE CARES ACT ESG rental assistance program will provide funding to support clients directly affected by COVID-19:

1. Rapidly re-house homeless individuals and families
2. Prevent families and individuals from becoming homeless.

ESG is a formula grant program. Funding may be distributed to units of local government and/or non profit organizations (24 CFR 576.2).

**All recipients** must consult with the Local Homeless Coordinating Committee operating within the jurisdiction in determining how to utilize ESG funds to meet the needs of the most vulnerable. Arrears can be funded by CARES Act ESG funding with some limitations. To see a full description of limitations to arrears, please see [here](#).

### Eligibility

Until December 31, 2020, the source documentation requirements for income certification related to households are waived, as long as the tenant provides a self-certification of their income that indicates how the tenant's financial situation has changed and includes all income, including unemployment or emergency benefits, received as a result of the pandemic.

The minimum eligibility criteria for ESG beneficiaries are as follows: For rapid-rehousing assistance, beneficiaries must meet the criteria under paragraph (1)(i) of the "homeless" definition under § 576.2. For homelessness prevention assistance, beneficiaries must meet the requirements for those at "imminent risk of homelessness" as described in 24 CFR 576.103. Further eligibility criteria may be established at the local level in accordance with 24 CFR 576.400(e).

### Key points:



**Extremely Low Income vs. Area Median Income Limits.** The "Extremely Low Income (ELI) families" limits do NOT apply to the ESG or Continuum of Care (CoC) programs. ESG does not use the ELI measure to establish income limits but instead uses the 30% of Area Median Income (AMI) income limits. Please use the 30% of AMI tables. If ESG recipients/subrecipients were to use the ELI standard, some applicants for ESG assistance might be falsely determined to be eligible for homelessness prevention assistance, when actually their incomes were over 30% of AMI.

Under the ESG program, income eligibility is based on the HUD income limits in effect at the time of income verification. Income eligibility is not based on HUD income limits that correspond with the grant year under which the ESG funds were awarded.

**Restriction of Rental Assistance to Units with Rent at or Below FMR Requirement:** Restriction of rental assistance to units with rent at or below FMR - Under the CARES Act, the FMR restriction is waived for any individual or family receiving Rapid Re-housing or Homelessness Prevention assistance who executes a lease for a unit during the 6-month period beginning March 31, 2020. The ESG recipient or subrecipient must still ensure that the units in which ESG assistance is provided to these individuals and families meet the rent reasonableness standard.



**Rapid Re-Housing Income Requirements.** Please keep in mind for program participants receiving ESG "Rapid Re-Housing" assistance, an income assessment is not required at initial evaluation. Applicants must be considered "literally homeless" by the HUD definition. At re-evaluation — which must take place not less than once annually for rapid re-housing — the participant's household must have an

annual income that does not exceed 30% of AMI. 24 CFR 576.106(d)(1) - Restriction of rental assistance to units with rent at or below FMR. Under the CARES Act, the FMR restriction is waived for any individual or family receiving Rapid Re-housing or Homelessness Prevention assistance who executes a lease for a unit during the 6-month period beginning March 31, 2020. The ESG recipient or subrecipient must still ensure that the units in which ESG assistance is provided to these individuals and families meet the rent reasonableness standard.



**Homelessness Prevention Income Requirements.** The ESG Program interim rule limits eligibility for homelessness prevention assistance to individuals and families with incomes below 30% of AMI at intake. However, the CARES Act the income limit increases from 30% to 50% AMI for Homelessness Prevention component with the required frequency of re-evaluations for homelessness prevention assistance under section 576.401(b) is waived for up to 2-years beginning March 31, 2020, so long as the recipient or subrecipient conducts the required re-evaluations not less than once every 6 months.

**Utah ESG CARES Act Funding for Rapid-rehousing and Homeless Prevention:**

\$3,170,277 - Will be funded to nine agencies throughout the state as allocated through formula in alignment with HCD Community Services Block Grant (CSBG). Alignment of ESG and CSBG will allow coordination of funding sources and will help provide single access points in local areas for CARES funded rental assistance and homeless prevention. Proposed to utilize funding in jurisdictions outside of Salt Lake County.

AGENCY	LHCC	COUNTY	AGENCY TOTAL
Bear River Association of Governments (BRAG)	• Bear River	Cache, Rich, Box Elder	\$359,934
Community Action Services and Food Bank (CASFB)	• Mountainland	Summit, Utah, Wasatch	\$746,248
Family Connection Center dba Open Doors (FCC-Open Doors)	• Weber, Davis	Morgan, Davis	\$290,763
Five County Association of Governments (Five County AOG)	• Iron, Washington	Beaver, Garfield, Iron, Kane, Washington	\$523,158
Ogden Weber Community Action Partnership (OWCAP)	• Weber	Weber	\$284,252
Southeastern Utah Association of Local Governments (SEUALG)	• Carbon/Emery, Grand, San Juan	Carbon, Emery, Grand, San Juan	\$273,429
Six County Association of Governments (Six County AOG)	• Six County	Juab, Millard, Piute, Sanpete, Sevier, Wayne	\$391,722
Salt Lake Community Action Program dba Utah Community Action (SLCAP-UCA)	• Tooele	Tooele	\$89,945
Uintah Basin Association of Governments (UBAOG)	• Uintah	Daggett, Duchesne, Uintah	\$210,827
		<b>TOTAL</b>	<b>\$3,170,277</b>

**Documentation**

- Client services must be recorded in the Homeless Management Information System (HMIS)
- Documented homelessness status

- Unemployment verification
- Income verification for Homeless Prevention

**State Contact**



- Tricia Davis: [tadavis@utah.gov](mailto:tadavis@utah.gov)



HOME FUNDS CAN BE USED to provide direct assistance to low-income households who need help paying their rent. HOME funded Tenant-Based Rental Assistance (TBRA) is a rental subsidy that helps make up the difference between what a renter can afford to pay and the actual rent for a home.

## Participating Jurisdiction Requirements

- Must execute a rental assistance contract with the tenant for a term mutually agreed upon by all parties, but not to extend past December 31, 2020.
- Must document its criteria for selecting individuals and families to be assisted by the TBRA program.
- Must establish procedures for conducting physical inspections of units that would have been subject to HQS inspections within 120 days of December 31, 2020,

## Participating Jurisdiction Eligible Activities

- Participating jurisdictions may pay the full cost of monthly utilities in addition to rental assistance and security deposit payments for new and existing TBRA families affected by the COVID-19 pandemic. This is not to exceed December 31, 2020.
- Participating jurisdictions may provide up to 100 percent subsidy for rent, security deposit payments, and utility bills paid by tenants affected by a reduction or loss of income from the COVID-19 pandemic. This is not to exceed December 31, 2020.
- Participating jurisdictions must do a visual inspection for lead-based paint. HUD has specifically stated that a visual inspection is not waived on units older than 1978.

## Eligibility

Until December 31, 2020, the source documentation requirements for income certification related to households are waived, as long as the tenant provides a self-certification of their income that indicates how the tenant's financial situation has changed and includes all income, including unemployment or emergency benefits, received as a result of the pandemic.

For each fiscal year allocation, at least 90% of households who receive HOME TBRA assistance must be very low-income. This means that they have a gross annual household income of 60% or less of the median income for their area, as determined by HUD. No assisted household may have an income that exceeds 80% of area median income.

## Eligible Units

Assisted households identify the housing unit of their choice. Eligible properties may be publicly or privately owned. TBRA may be used in HOME-assisted units, but the property does not have to be a HOME-assisted unit. The participating jurisdictions can elect whether it will allow an assisted household to choose a unit outside its jurisdiction.

## Key Program Requirements

HOME requires that TBRA projects meet the following requirements:

- Must be at or below 60% AMI. See the following table for eligibility levels by county.

## 60% AMI by County

County	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Beaver	\$28,920	\$33,060	\$37,200	\$41,280	\$44,640	\$47,940	\$51,240	\$54,540
Box Elder, HUD Metro FMR Area	\$28,920	\$33,060	\$37,200	\$41,280	\$44,640	\$47,940	\$51,240	\$54,540
Logan, UT-ID MSA	\$28,920	\$33,060	\$37,200	\$41,280	\$44,640	\$47,940	\$51,240	\$54,540
Carbon	\$28,920	\$33,060	\$37,200	\$41,280	\$44,640	\$47,940	\$51,240	\$54,540
Daggett	\$33,480	\$38,280	\$43,080	\$47,820	\$51,660	\$55,500	\$59,340	\$63,180
Ogden-Clearfield HUD Metro FMR Area	\$35,700	\$40,800	\$45,900	\$51,000	\$55,080	\$59,160	\$63,240	\$67,320
Duchesne	\$30,240	\$34,560	\$38,800	\$43,200	\$46,680	\$50,160	\$53,560	\$57,060
Emery	\$28,920	\$33,060	\$37,200	\$41,280	\$44,680	\$47,940	\$51,240	\$54,540
Garfield	\$28,920	\$33,060	\$37,200	\$41,280	\$44,640	\$47,940	\$51,240	\$54,540
Grand	\$28,920	\$33,060	\$37,200	\$41,280	\$44,640	\$47,940	\$51,240	\$54,540
Iron	\$28,920	\$33,060	\$37,200	\$41,280	\$44,640	\$47,940	\$51,240	\$54,540
Provo-Orem MSA	\$33,480	\$38,220	\$43,020	\$47,760	\$51,600	\$55,540	\$59,280	\$63,060
Kane	\$28,920	\$33,060	\$37,200	\$41,280	\$44,640	\$47,940	\$51,240	\$54,540
Millard	\$28,920	\$33,060	\$37,200	\$41,280	\$44,640	\$47,940	\$51,240	\$54,540
Ogden-Clearfield HUD Metro FMR Area	\$35,700	\$40,800	\$45,900	\$51,000	\$55,080	\$59,160	\$63,240	\$67,320
Piute	\$28,920	\$33,060	\$37,200	\$41,280	\$44,640	\$47,940	\$51,240	\$54,540
Rich	\$28,920	\$33,060	\$37,200	\$41,280	\$44,640	\$47,940	\$51,240	\$54,540
Salt Lake City HUD Metro FMR Area	\$34,740	\$39,720	\$44,700	\$49,620	\$53,640	\$57,600	\$61,560	\$65,520
San Juan	\$28,920	\$33,060	\$37,200	\$41,280	\$44,640	\$47,940	\$51,240	\$54,540
Sanpete	\$28,920	\$33,060	\$37,200	\$41,280	\$44,640	\$47,940	\$51,240	\$54,540
Sevier	\$28,920	\$33,060	\$37,200	\$41,280	\$44,640	\$47,940	\$51,240	\$54,540
Summit	\$46,140	\$52,740	\$59,340	\$65,660	\$71,160	\$76,440	\$81,720	\$87,000
Tooele HUD Metro FMR Area	\$31,200	\$35,640	\$40,080	\$44,520	\$48,120	\$51,660	\$55,260	\$58,800
Uintah	\$32,200	\$36,840	\$41,460	\$46,020	\$49,740	\$53,400	\$57,120	\$60,780
Provo-Orem MSA	\$33,480	\$38,220	\$43,020	\$47,760	\$51,600	\$55,540	\$59,280	\$63,060
Wasatch	\$35,220	\$40,260	\$45,300	\$50,250	\$54,560	\$58,380	\$62,400	\$66,420
St. George MSA	\$28,920	\$33,060	\$37,200	\$41,280	\$44,640	\$47,940	\$51,240	\$54,540
Wayne	\$28,920	\$33,060	\$37,200	\$41,280	\$44,640	\$47,940	\$51,240	\$54,540
Ogden-Clearfield HUD Metro FMR Area	\$35,700	\$40,800	\$45,900	\$51,000	\$55,080	\$59,160	\$63,240	\$67,320

### Documentation

- Self-Certification Form, which must include all monthly income and indicate how tenant's financial situation has changed (i.e., job loss or reduced wages)

### State Contact



- Jess Peterson: [jesspeterson@utah.gov](mailto:jesspeterson@utah.gov)

## CDBG

THIS FUNDING HAS BEEN ALLOCATED to Tooele and Weber Counties. All activities must meet one of the three CDBG National Objectives, which are: Benefit to Low-to-Moderate Income persons (income not to exceed 80% AMI), Urgent Need (funding limited to 30% of total CDBG funding) and Elimination of Slum & Blight.

CDBG-CV funding, allocated under the CARES Act, can be used for Subsistence Payments which is an eligible activity. Subsistence Payments are defined as “One-time or short term (no more than three months) emergency payments on behalf of individuals or families, generally for the purpose of preventing homelessness.” Examples include utility payments to prevent cutoff of service and rent or mortgage payments to prevent eviction.

### Eligibility

Rental assistance under the State CDBG program will be limited to those persons living in Tooele and Weber Counties. Each county has \$100,000 to allocate towards rental assistance. Ogden residents are not eligible for assistance from the State Small Cities CDBG program. The CDBG-CV rental assistance program will be carried out by Tooele County Housing Authority and Weber County Housing Authority. Assistance is limited to individuals and families earning at or below 80% of Area Median Income (AMI).

### Documentation

Applicants must provide:

- Rental Assistance Program Application
- Social Security Cards for all household members
- ID Card (Driver License)
- Income documentation - consecutive and most recent 60 days of pay stubs
- Current Lease
- Rent receipts
- Documentation that family is not receiving unemployment benefits

### State Contact



- Cheryl Brown: [cbrown@utah.gov](mailto:cbrown@utah.gov)

## CSBG

THE COMMUNITY SERVICES BLOCK GRANT (CSBG) is a block grant received by Utah and based on a federal formula. Utah has nine community action agencies which receive CSBG funds, also allocated through formula. The community action agencies are listed in the above ESG table and their jurisdictions cover all 29 counties in Utah. CSBG is a flexible funding source to address poverty at the local level. The community action agencies conduct assessments to determine local need and to construct a local community action plan, which guides their use of funds. Rental housing assistance is an eligible activity within CSBG.

### Eligibility

The CARES Act amended eligibility for CSBG funded activities in FFY 2020 and FFY 2021 to 200% of the Federal Poverty Level (FPL).

### Program

CSBG programs are determined by community action agencies based on a needs assessment and detailed in a community action plan. Due to the local and flexible nature of activities funded, programs vary between agencies.

CSBG Program Policies and Procedures are determined by each of the community action agencies.

Purpose of CARES Act CSBG Supplemental funding: to prevent, prepare, and respond to Coronavirus. The purpose leaves in place all eligible CSBG activities.

### Documentation

- Individuals must provide COVID19 specific self certification documentation.

### State Contacts



- Sisifo Taatiti: [staatiti@utah.gov](mailto:staatiti@utah.gov)
- Karen Quakenbush: [kquakenbush@utah.gov](mailto:kquakenbush@utah.gov)