

OREGON HOUSING AND COMMUNITY SERVICES
CVRRP - FREQUENTLY ASKED QUESTIONS
November 25, 2020 Update

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A. RENTAL, UTILITY ASSISTANCE

Q) I did have a question and it's about utility assistance. I received an email from one of our partner agencies saying the local energy assistance from Multnomah County was gone, and so my question is: if local utility assistance programs are out of funding, then could CARES be used to pay for them? Or is it a strict ban?

*A) Changes to the CVRRP CARES (80% AMI) program guidance define that utility assistance post 8/19/20 is not allowed. CVRRP (50% AMI) funding converted to CVRRP CARES program guidance in September and now follows the same utility assistance guidance and use of these funds for local utility assistance is not allowed. **However, Utility payments that are part of rent payments continue to be allowed.** Additionally, Energy & Weatherization was awarded additional EASCR (Energy Assistance Stability Coronavirus Relief) funds to assist with utility costs on behalf of COVID impacted eligible households. I'd suggest contacting your Energy Assistance Coordinator for assistance with EASCR funds. Note, OHCS recognizes that these changes have been rapid and frequent, please reach out to your program analyst to discuss any needed exceptions or flexibility with this Utility Payment policy.*

Q) I am working on one of my COVID-CARES. The landlord let me know that ShelterCare Permanent Supportive Housing is already partially subsidizing the rent. Does that prevent him from getting COVID-CARES at all? The Rent Relief programs can work with some housing subsidies, such as section 8. It can pay the tenant portion of the rent. I doubt we can have a dual enrollment through, but I thought I'd check with OHCS.

A) This is no problem – it's a similar program to Section 8, funded by HUD. Ultimately it involves a services requirement unlike a section 8 voucher. The CVRRP program can pay the tenant portion of their rent.

Q) I have a client who is very dissatisfied with the agency who originally helped them with a CARES Rent Relief payment. In HMIS he has been enrolled, received the service and exited from the program. If he needs subsequent help, can he receive it from a different sub recipient agency? He would then have two separate CARES enrollments in HMIS.

A) We checked with our HMIS folks and as long as the information is properly captured for the person receiving services, there is not a problem. No issues at all, totally OK for reporting.

Q) I do realize that CVRRP and CARES are still two programs with different eligibility requirements. But now that they are the same funding stream, can multiple month's advance rent payments be paid with CVRRP, if they meet all other CVRRP eligibility requirements?

A) Yes, you can pay multiple months rental assistance with CVRRP and CVRRP CARES funding. How your agency allocates rental payments should be based on adopted policy. OHCS does not restrict the number of months an agency can provide rental assistance. What we do ask, though is if an agency does provide multiple months of rental assistance to a household, that the agency practice is captured as policy, documented, and use of practice maintained in case notes and used based on standard policy.

B. CLIENT ASSESSMENT AND ELIGIBILITY

Q) What are the options if someone cannot provide a ID?

A) If an applicant does not have government identification, the process would be to follow your agency policy and if it is not addressed applicant would self-certify. Self-Certification is provided below and is outlined in the CVRRP Manual, September 15, 2020, page 12..

COVID-19 related eligibility may be documented through Self Certification and/or within guidelines for Remote Application and Documentation.

Self-Certification may include, but is not limited to:

- Declaration that a household member's health is at risk due to COVID-19 related factors,*
- Employment or income has been lost due to COVID19 related factors,*
- A household member has been directly impacted by a business closure related to COVID-19,*
- A household member has been diagnosed with COVID19,*
- Overcrowding has occurred in the household's current living situation and they have been requested to move due to COVID-19 social distancing guidelines.*

Applicants who apply for assistance and provide eligibility documentation remotely may do so via electronic and other communication; e.g., phone, email, text, electronic messaging, mail and other electronic or remote means. Documentation must be kept in the client file.

Subgrantees and subrecipients are required to develop and maintain policies and procedures for the use of a remote application and eligibility documentation process and be available for review by OHCS, upon request. Such policies and procedures must be applied equally across services that use or are supported by CVRRP and CVRRP CARES CRF funding.

These policies and procedures must address the following elements:

- In what circumstances a remote application and documentation process will be used;*
- Verification of the identity of the applicant;*
- Verification and documentation of qualification for assistance in relation to program eligibility criteria;*
- Verification and documentation as appropriate for ongoing demonstration of eligibility; and*
- Notification and documentation to client in relation to release of information, service denial or termination and grievance and appeal requirements.*

The language in the documentation may be as simple as having them declare and certify that they are in fact who they claim to be, they have been impacted (if this is COVID related) by COVID-19 and they do not have adequate resources to pay for an overnight lodging.

Q) We have an internal conversation regarding rental assistance to staff members - many of whom are from impacted communities needing rental assistance support. If they meet the eligibility guidelines, follow the same process as the public, and we an internal verification process with another case worker (other than themselves), is there anywhere in your guidelines that does not allow for our staff members to also access rental assistance?

A) Here is some guidance that may help.

- **Third Party Certification:** *We believe that third party certification is critical here to ensure more accountability and documentation of need. Self-Certification should not be used in this situation.*
- **Manager Sign Off:** *We advise that a manager, rather than a fellow staff, signs off on this service to limit the possibility for co-workers being in the position of “approving” these.*
- **Equal Access:** *We know that there is a limited amount of funding available for these services, and we want to be sure that staff working on this program have equal access to the resource as the general public. If there is a lottery, for instance, the staff need to abide by the same lottery system. If there is a route to get access, like going through 211, then the staff need to access it in the same way.*

Q) If we have one person who needs help with their rent, but the other roommates do not do we just determine eligibility on the one person or do we have to do it on the whole household?

A) In this case, you’d want to evaluate the person that is requesting assistance as the entirety of the household. The other roommates are independent economic units from your client – they are not part of income/eligibility determination and thus you wouldn’t need to contact them at all. Essentially, you’d need to document that the client has X expenses and X income for themselves and they would stand alone for the purposes of the program eligibility.

Q) I have a family that that operates a subcontracting business which is the sole source of the family’s income. Their Assessment was done on 7/27/2020, but we did not contact them until 9/21/2020.

Their employer verified in writing that the availability of sub-contract work given to their family business slowed down significantly due to Covid-19. In June it was \$4,477.00 and July it was only \$2,277.00, which at the time they were assessed would have qualified them for rental relief assistance. Their income did pick up in August to \$6,370.00, which disqualifies them for assistance.

How would you suggest we handle this, since they were eligible when they came through our assessment process?

A) We believe that this is an area where discretion is key. This scenario is approved based on the snapshot method where the family applied for assistance during their income drop. However, paying forward rent in this scenario is not permitted because the family would be over income and not eligible for assistance. You can help them get caught up on back rent. Our rationale is that if there was no backlog, they would have been served at the time they applied in July. We don't want to penalize the households for the influx of households creating wait times.

B) One last question is it safe to use this method for folks in this same situation going forward or do I need to get your approval every time?

A). When the person applied for assistance, they were below 80% AMI. If they subsequently increased their income, but still need assistance when you make contact with the client for

rendering assistance, you may pay their back rent from the period when they were income eligible. Paying rent forward is not eligible due to the need to set proper checks and balances and to ensure we are distributing resources to those most in need.

Q) What if there is a family that was laid off not due to COVID-19, but is having trouble finding work due to the pandemic--would they qualify? or is it only if they originally lost their income due to the pandemic?

This would be considered eligible based on the program specific eligibility.

CVRRP and CVRRP CARES CRF services require applicants to meet one of the program specific eligibility criteria to qualify for the programs:

- (1) Loss of employment or income due to COVID-19 related factors; **OR***
- (2) Directly impacted by business closure related to COVID-19; **OR***
- (3) Diagnosed or exposed to COVID-19; **OR***
- (4) Compromised health status or elevated risk of infection or vulnerability to health as related to COVID-19.*

In this case, OHCS would consider this person to have experienced a loss of income due to COVID-19 related factors. For instance, let's say that this person was laid off as a waiter in January 2020 for unrelated reasons to COVID-19. After the pandemic began, it became far more difficult to obtain a position as a waiter because of the impacts on the restaurant industry. They have now experienced an impact on their potential earnings due to COVID-19 Related factors. Depending on their situation, they may meet other criteria but this would be considered an eligible client for the above mentioned reasons.

C. FISCAL

Q) When do we need to submit our final Request for Funds (RFF) after the program

A) In consulting with fiscal and our CRF requirements, we can provide until 2/26/21 for final RFFs to be submitted for official reimbursement. This will allow you and your subrecipients time to collect necessary documentation and finalize all payments to vendors. You must still have committed all of your funds by 12/30/20, meaning documentation of eligibility determination and commitments to clients must be made on or before 12/30/20. Any RFF's that take place after 2/26/21 will be at risk of being voided due to non-compliance.

Q) Can we pay January 2021 rent as long as we make the commitments and determine eligibility before 12/30? I've heard that you extended this allowability into February 2021, is that true?

A) Yes, OHCS has extended the date that CAA's can pre-pay expenses (such as rental payments) from January 31st, 2021 to February 10th 2021. This will permit a CAA to pay for a January and February rental payment for a client, with the rationale that most rental payments come due on the 1st of the month. This can potentially support people who are newly impacted from the most recent spike and "freeze" on businesses in Oregon. This does not change the date that payments need to be obligated and committed to clients by, that date is still

12/30/20. This simply allows you to pay a rental payment that is for the month of January or February 2021 on or before the 12/30/20 deadline set by the Federal government.

Q) I don't understand what can take place before and after the 12/30 deadline for payments in January and February 2021. What needs to happen on or before 12/30/20 for a household to be served with these funds? What can take place afterwards?

A) All costs need to be incurred on or before 12/30/20. OHCS is interpreting the definition of an incurred expense as occurring when a grantee determines eligibility based on factors such as income, COVID impact and housing status. Essentially, you are "purchasing" the rent in December, to be paid in January or February 2021. This may look like conducting a screening or reviewing application materials on or before the 12/30 date and documenting that the applicant applied for and was approved for funding on or before the 12/30 deadline. We recognize that this eligibility determination is an important step but that it is likely the first step of many that take place to get funds out. Once this eligibility determination is complete on or before 12/30, CAA's can conduct the next steps to issue payment which may include working with a landlord to complete the W-9 or other forms or finalizing sending the actual payments out. Additionally, no Admin costs can be charged after 12/30/20 under this program due to the CRF regulations so you must charge staff time towards other programs such as EHA or CSBG as they complete these final steps.

In short, eligibility and screening of applicants must occur prior to the deadline but the follow-through actions such as issuing checks and other steps can take place after the deadline.

D. HMIS

Q) Does CVRRP still have a 6-month key performance? (I did think I read that this was now a "no," but I wanted to confirm)

A) CVRRP and CVRRP CARES do not require the 6-month key performance goal although you will need to complete HMIS destination field data. We recognize that many of the individuals you have helped will be difficult to track down for a 6-month follow up, but where they went at exit from the program is a critical field to track and understand the effectiveness of the rental assistance program.

Q) The FAQ's sounded like the CVRRP funds would now have the same expiration date as CRF, instead of their original expiration date of mid-2021 (July I think), do they now expire in December also?

B) Correct, when the funds were swapped from state to federal CRF dollars, the date of expiration also changed. Both programs, CVRRP (50% AMI) and CVRRP CARES (80% AMI) funding expires December 30, 2020.