

OREGON HOUSING AND COMMUNITY SERVICES
STARR - FREQUENTLY ASKED QUESTIONS
May 11, 2021 Update

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A. Income Eligibility

1. If a client was below income limits at time of placement on a waitlist, but then by the time they were assisted, their income was above the limit, could they be assisted? Waitlists sometimes operate based on an initial screening, many times, via telephone where a client will certify their income; however, that income is not verified until they are connected with an eligibility worker at which time the income is verified. So, if a client is on the waitlist for several months, their income may have changed.
 - A) *Waitlists typically operate by verbal confirmation or by pre-application and income is not verified through documentation at that time. If verification occurs after several months and the client's income has risen, their rent arrears (based on less income availability at the time) may still very much be an issue that could lead to eviction. OHCS is allowing flexibility for the STARR program ONLY that due to the unique nature of the pandemic's unemployment situation, the eviction moratorium, and the fact that clients are waitlisted through no fault of their own, it is acceptable to pay the rental arrears based on the initial stated income. However, no current/future rent payments for a client can be paid unless based on the program's income eligibility at time of verification and which is supported by documentation. CAA internal policies and procedures for this program should include clarity that "If a client's income meets eligibility at the time they are placed on a waitlist, but the income has risen above the eligibility limit at the time assistance can be provided, CAAs may pay an arrears balance for said client, but no further rental payments can be made unless client once again meets income eligibility."*
2. If a client is income eligible, can we client needs assistance through June unless otherwise stated?
 - A) *There are no recertification requirement with STARR to assess need, so you would need to determine if you felt the services provided would allow the client to obtain or maintain permanent housing and were able to make that case.*
3. Do we count the extra unemployment stipend as income?
 - A) *STARR funds are a COVID assistance program funded with state dollars and would have this same exclusion for the extra COVID unemployment benefits, so no you would not count those benefits as part of their income, but you would still count the base unemployment benefit.*
4. Do student loans, scholarships or grants count towards income?
 - A) *All student income is excluded for the purposes of STARR income eligibility.*

5. Can Medicare costs deducted from a social security payment be excluded as income?
A) Yes.
6. If we are only providing a hotel/motel voucher while a client is waiting to find housing, do they have to meeting income eligibility?
A) *If you are only providing a hotel/motel voucher and no other financial assistance, then a client would not have to meet income eligibility requirements. Clients you are assisting with only a hotel/motel voucher would be considered literally homeless and would not have to meet income eligibility; however, once they find housing and are requesting assistance with move-in costs, deposits, application fees, etc., then the client must be at or below 80% of AMI.*

B. What is Included in Rent?

1. Landlords are getting creative with fees and rents. Can storage, garage, parking, pet rents/monthly fees be considered as part of rent?
A) *Many landlords are charging extra costs to rent a garage space or other storage on-site. Some may have a shop or other garage-type space on the property which would be charged separately, but as part of the total monthly rent. Landlords are even charging for parking spaces when parking is limited. Pet rent is also becoming quite common. Storage rent has always been allowable under rapid re-housing as literally homeless people may need to have a storage unit for their personal items before they become stably housed. Other types of rents, such as garage, storage, parking or pet rents, included as part of housing rent and located on-site are also allowable. If the charge is for a space that is not a part of the main dwelling and off-site, it would not be allowable (such as a shop off-site and used for business purposes).*
2. Can we pay a past due rent for a property that the client moved out of?
A) *STARR guidance requires that late fees and arrearages be a one-time payment of arrears incurred after 4/1/20 and that it enables households who are imminent risk of homelessness or unstably housed to regain stability in their current housing or other permanent housing for prevention services or that it enables a household that is literally homeless to transition directly to permanent housing for rapid re-housing services. As long as you are able to document that paying these arrearages allows them to obtain and maintain permanent housing, it would be allowable.*
3. May a renter subject to a “rent-to-own” agreement with a landlord be eligible for STARR assistance?
A) *A grantee may provide financial assistance to households that are renting their residence under a “rent-to-own” agreement, under which the renter has the option (or obligation) to purchase the property at the end of the lease term, provided that a member of his or her household:*
- I. is not a signor or co-signor to the mortgage on the property;***
 - II. does not hold the deed or title to the property; and***
 - III. has not exercised the option to purchase.***
4. Can rent assistance be provided to someone that stays in a dorm?
A) *This applicant would need to provide proof of a rental obligation and would need to be at risk of homelessness or unstably housed. If they are looking to get out of dorms for COVID-related*

reasons, you would be able to assist with locating a new residence and help them to move into that residence.

7. We have clients who are currently over income and requesting assistance for past due rent. They are able to provide that at the time the rent was incurred, they met the income limits even though they do not meet those limits now. Can we provide assistance for the past due rent at the time they met the income limits?
 - A) *Yes, you can make a payment for back-rent for a period of time in which the client met income qualifications with appropriate income documentation. You must apply the same guidance to all clients equally to ensure eligibility is applied to all clients the same way and no future payments for rent can be made for a period of time in which you know them not to be income qualified.*

C. Landlords and W9s

1. What do I do if a landlord will not provide a W9?
 - A) *OHCS cannot provide tax advice, but organizations working with landlords should follow all IRS regulations when setting up vendor payments. You may find more information at the following website for what a W9 form is and why collecting a W9 for a business to business (CAA to Landlord, for instance) vendor relationship is best practice: <https://www.w9manager.com/always-get-a-w-9-form/> and <https://www.sigowitz.com/irs-form-w-9-best-practices/>*
2. What if a landlord is uncooperative or will not accept rent being paid directly to the landlord on the tenant's behalf?
 - A) *STARR funds may be disbursed directly to the tenant if the landlord is unwilling to accept funds from a 3rd party; however, CAAs must obtain the CAA's Case Manager's Supervisor's approval, documented in the file, for any rent payment provided directly to the tenant.*

D. Conflict of Interests

1. If we have employees that apply for STARR assistance or if we own the unit that STARR applicant resides in, do we need OHCS approval before being able to assist them?
 - A) *If you have employees that meet eligibility for STARR, you may assist them; however, we recommend that a manager/supervisor approves the assistance in writing to ensure applicants are being processed in the same manner as other applicants. For applicants that are renting in units owned by the subgrantee/subrecipient – you cannot steer potential applicants to these units; however, it is acceptable to assist them in the same manner as other applicants. Additional information can be found on page 8 "Conflict of Interest" section of the STARR Guidance.*

E. Application Processing, Denial, Recertification

1. Application were being accepted before we received STARR funding. Do we use the rent information provided at the time of application or do we need to update the information or use original information for past due rent and updated information for current/future rent?
 - A) *All program expenditures must be supported by documentation that demonstrates how the expenditure aligns with the allowable component. You would need to have proof of past due rent to pay that amount and you would need proof of current rent amount in order to pay for current/future rent.*

2. Can a client apply more than once for the STARR program?
 - A) *Expenses are eligible to be paid during the program period (from 4/1/20 – 6/30/21). OHCS does not have a requirement for the number of times or number of months that a client may be assisted and no per-client limitation on the amount of assistance you can provide. We recommend that you follow your agency's program policies for direction on the application process and length of time and amount of assistance allowed.*
3. Can we deny an application for any other reason that being over income?
 - A) *STARR requirements include COVID-specific eligibility, housing status eligibility and income eligibility. If a client did not meet any one of these eligibility requirements, you could deny them for that reason.*

F. COVID Eligibility

1. Do we just accept a client's verbal or written statement regarding COVID-related hardship or do we ask for proof?
 - A) *Self-certification is allowed as outlined in the manual (page 13) "Eligibility Documentation".*

G. PHAs and Tenant Portion of Rent

1. Can we pay the tenant's portion of rent arrears when the tenant has a Housing Choice Voucher?
 - A) *An assisted family has as statutory obligation to pay the family share of rent in the HCV program; however, emergency assistance to mitigate a pending eviction action or potential eviction action due to unpaid rent would comply with 24 CFR 982.551(n) (or any other provision) for the HCV family or any 24 CFR Part 960 requirement for public housing tenants and these payments from the state may be excluded as income under 24 CFR 5.609(c)(3) and (c)(9).*
2. Can we pay the tenant's portion of prospective rent when the tenant has a Housing Choice Voucher?
 - A) *The assisted family has a statutory obligation to pay the family share of rent amount in HCV program. Payments made directly to the PHA or landlord for prospective rent would violate the relevant sections of regulatory provisions (42 USC 1437(a)(1) and 1437f(o)(2)(A)); however, if the CAA made payments directly to the family it would mitigate sections 3 and 8(o) statutory concerns and would not violate 24 CFR 982.551(n) under the HCV program. If the CAA made lump payments directly to the family the amounts may be disregarded as income under 24 CFR 5.609(c)(3) and (c)(9). CAAs must obtain the CAA's Case Manager's Supervisor's approval, documented in the file, for any rent payment provided directly to the tenant.*