

To: Gatekeepers
From: Homeless Services Section Staff
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Please distribute to: Executive Directors Fiscal Staff Homeless Services Program Staff
 Rental Assistance Program Staff

Category: Funding Informational

Update For: Federal CARES Act Funding Update: COVID-19 Rent Relief (CARES) Program Guidance

Message:

In conjunction with the MGA amendments and allocation workbook received earlier this week, attached is the associated Program Guidance for the COVID-19 Rent Relief CARES Program (CVRRP-CARES) funds.

This guidance is intended to supplement the existing CVRRP manual and should be used to reference the differences between the CVRRP state funds and the CARES Act federal funds. There will not be a new manual, so please do not wait to start spending your funds.

As we anticipate there will be questions as we move into implementation, we have created a centralized email address to which all CVRRP-CARES inquiries should be directed: CVRRP.CARES@oregon.gov. We will be using this platform to ensure questions get answered by appropriate program staff, and also to support an iterative frequently asked questions (FAQ) document that will be updated and posted to our website. We kindly request that you utilize this email platform instead of reaching out to individual OHCS staff for questions regarding these funds to allow us to respond in a more expedited manner.

We will also be hosting a webinar with CAA leads in the near future – please stay tuned for more information.

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COVID-19 Rent Relief CARES Program (CVRRP-CARES)

June 9, 2020



COVID-19 Rent Relief (CARES) Program Guidance

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1. COVID-19 Rent Relief (CARES) Program Intent

The Oregon eBoard awarded Oregon Housing and Community Services \$52,250,000 in rental assistance for people who experienced a loss of income, compromised health conditions, at risk of losing their housing, or diagnosed or exposed to COVID-19, and/or displaced or unstably housed as the result of public health measures taken to reduce the spread of COVID-19. Oregon Housing and Community Services, in partnership with the CAPO network, is taking steps to ensure that people impacted by the coronavirus have access to resources delivered through Community Action Agencies across the State. COVID-19 Rent Relief (CARES) Program funds will be disbursed using a formulaic method as defined in the Master Grant Agreement.

It is widely acknowledged that people experiencing poverty and other marginalized groups have historically borne the brunt of infectious disease epidemics and the lack of socially conscious government responses to them. According to Oregon Health Authority data, communities of color are disproportionately impacted by COVID-19 in Oregon. Using a robust and authentic approach rooted in a commitment to equity and racial justice, agencies are expected to administer culturally specific outreach to ensure communities of color are informed on the program and, if income eligible, are receiving access to these services.

2. Program Summary

COVID-19 Rent Relief (CARES) Program provides rental assistance to landlords for individuals and families who have experienced a loss of income related to COVID-19, been directly impacted by business closure related to COVID-19, have a compromised health condition, diagnosed or exposed to COVID-19, and/or displaced or unstably housed as a public health measures to reduce the spread of COVID-19. Funds are provided through the CARES Act, federal coronavirus relief fund, by Oregon's eBoard and are provided in response to the COVID-19 pandemic. In order to qualify for assistance, households must meet income eligibility, housing status requirements and other CVRRP (CARES) Program eligibility requirements.

CVRRP (CARES) funds are to be used for people needing assistance during the coronavirus crisis who:

- Are impacted by COVID-19 and earn up to 80% AMI.
- Are impacted by loss of income, compromised health conditions and or at risk of losing their housing.

This Program Guidance supplement reflects program requirements and uses specific to the CVRRP (CARES) funds. Refer to the State Homeless Funds Program Operations Manual for Administrative Requirements, General Program Requirements, Applicant Eligibility,

Allowable Program Component and Expenditures, Financial Management, Data Requirements, Requirements, Applicable Rules and Regulations and Definitions for direction on the use of Emergency Housing Assistance, State Homeless Assistance and COVID-19 Rental Relief guidance, requirements and regulations.

(A) CVRRP (CARES) Exceptions

CVRRP (CARES) incurred related expenses are eligible for the period that begins on March 1, 2020 and ends on December 30, 2020. Rent payments can only go back as far as the March rent to be within the 03/01/20 to 12/30/20 period. Request for Funds should be submitted to OHCS for payment prior to 12/30/20.

CVRRP (CARES) funds are required to adhere to all fiscal related Spend Down policies. Subgrantees will receive a template to populate for the spenddown that fiscal staff will track.

CVRRP (CARES) funds are exempt from the six-month follow up Key Performance Measure.

CVRRP (CARES) administrative funds are limited to 5% direct admin only.

3. Applicant Eligibility

CVRRP (CARES) Requirements	CVRRP (CARES) Housing Status Eligibility	CVRRP (CARES) Income Eligibility	CVRRP (CARES) Eligible Program Components
<ul style="list-style-type: none"> • Loss of income due to COVID-19 related factors • Compromised health status or Elevated risk of infection or Vulnerability due to COVID-19 factors 	<ul style="list-style-type: none"> • Unstably housed • Literally homeless • Imminent risk of homelessness • Fleeing Domestic Violence 	<ul style="list-style-type: none"> • At or below 80% AMI 	Rental Assistance: <ul style="list-style-type: none"> • Homeless Prevention • Rapid Re-Housing • Rent payments and rent arrears • Manufactured “lot rents” • Housing moving costs, security and utility deposits, application fees • Utility Arrears

(A) Housing Status

(Housing Choice category definitions are provided in the State Operations Manual)

Category 1: Literally Homeless

Category 2: Imminent Risk of Homelessness

Category 3: Homeless Under Other Federal Statutes

Category 4: Fleeing/Attempting to Flee Domestic Violence

Category 5: Unstably Housed (CVRRP (CARES))

CVRRP (CARES) Unstably Housed Definition

- Is at risk of losing their housing, and does not otherwise qualify as homeless under the above listed (1-4) categories, provided that:
 - They have been notified to vacate current residence or otherwise demonstrate high risk* of losing current housing; **AND**
 - Lack the resources or support networks to obtain other permanent housing.
- *High risk may be demonstrated by, but is not solely defined as, having experienced a loss of income, or other threat to housing stability due to the COVID-19 crisis, or displaced as a result of public health measures taken to reduce the spread of COVID19, and it is unknown if the problem will resolve in time to avert a loss of housing.

(B) Income

CVRRP (CARES) provided services require applicants to be low income; i.e., gross household income at or below 80% of area median income. Additional supplemental employment income (\$600) issued during the COVID-19 pandemic are excluded for the purpose of income eligibility requirements.

Income includes the current gross income of all adult household members at the time of assessment. Income earned by household members who are minors or full-time students and are not considered heads of household is excluded. While household assets should be identified to determine that a program applicant lacks the resources to obtain or retain permanent housing, they are generally not counted as income. Documentation of income for 30 days prior to the assessment must be kept in the applicant file. If income statements are not available for 30 days prior to the assessment, applicant must self-certify the previous 30 days of income.

Convert periodic wages to annual income by multiplying:

1. *Hourly wages by the number of hours worked per year (2,080 hours for full-time employment with a 40-hour week and no overtime);*
2. *Weekly wages by 52;*
3. *Bi-weekly wages (paid every other week) by 26;*
4. *Semi-monthly wages (paid twice each month) by 24; and*
5. *Monthly wages by 12.*

To annualize other than full-time income, multiply the wages by the actual number of hours or weeks the person is expected to work.

(C) Program Specific Eligibility Criteria

CVRRP (CARES) services require applicants to meet one of the program specific eligibility criteria to qualify for this program.

- (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.

(D) Citizenship and Residency

CVRRP (CARES) funds are from the Coronavirus Relief Fund (CRF) of the federal CARES Act. OHCS does not know at this time if CVRRP (CARES) funds can be utilized for serving non-citizens.

OHCS is seeking guidance on this matter.

For guidance on citizenship and residency requirements for other OHCS programs please refer to the State Program Operation Manual.

4. CVRRP (CARES) Eligibility Documentation

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.

5. Allowable Program Components and Expenditures

Program expenditures must be supported by documentation that demonstrates how the expenditure aligns with the allowable Rental Assistance component and helps the client to attain or maintain safe shelter.

CVRRP (CARES) Eligible Components:

- Rental Assistance as COVID RR CARES grant – reflecting Homeless Prevention and or Rapid Re-Housing Rental Assistance under the category name HP/RRH/RA;
- Category name in OPUS for Rental Assistance is HP/RRH/RA;
- 5% direct administrative fees.

CVRRP (CARES) Program funds can be used for the following program component:

CVRRP (CARES) Rental Assistance:

Homelessness Prevention and Rapid Re-Housing Rent Assistance is captured as one allowable component in OPUS under the grant COVID RR CARES. The category name in OPUS is HP/RRH/RA.

Allowable Expenditures:

- Housing costs such as rent payments;
- Late fees and arrearages (one-time payment of arrears may be paid for past due rent incurred before inception of program);
- Moving costs;
- Security and utility deposits and application fees;
- Manufactured home rental space “lot rents” or RV space for primary housing;
- Utility payments and arrearages (other utility assistance programs must be deferred to first, utility assistance is only eligible when other utility assistance cannot be obtained and providing utility assistance is necessary to ensure stability in housing) (utilities is inclusive of water, sewer, gas, garbage, and electricity; and
- Admin; 5% admin on direct staff cost.