

**NGA Briefing on Federal Emergency Rental Assistance  
National Association of Housing and Redevelopment Officials &  
Government Finance Officers Association**

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NATIONAL ASSOCIATION OF  
HOUSING AND REDEVELOPMENT  
OFFICIALS WEBINAR

**COVID-19**  
**Emergency Rental**  
**Assistance Program**

January 8, 2021



**NAHIRO**

*building communities together*

# ABOUT NAHRO

- Oldest (Est. 1933) and Largest (19,000 agency and individual members) Association of Housing and Community Development Professionals in the United States
- NAHRO Members Work with Private Landlords in Providing Rental Assistance to 1.6 Million Units.
- NAHRO Members Own and Manage More than 3 Million Homes for More than 7.9 Million People

# RENTAL HOUSING CRISIS

- **Renters may owe \$25 to \$34 billion by January 2021** (NCSHA/STOUT)
- **Renters Currently Owe Between \$34 Billion and \$70 Billion of Back Rent** (NLIHC)
- **Nearly 14 percent of renters, or 9.5 million renters, reported problems paying rent in the previous 30 days. 10% of adult renters were behind on rent: 4% - one to two months. 3% - two or more.** (Urban Institute)

## COVID-19 RELIEF – EMERGENCY RENTAL ASSISTANCE

- \$25 Billion in Funds (\$400 Million for Territories, \$800 Million Indian Housing, \$15 Million for Treasury Administration – \$23.785 Remains)
- Distributed by U.S. Department of Treasury by January 26, 2021
- Distributed to States and Local Jurisdictions
  - States Receive the Full State Allocation Minus Allocation Received by Local Jurisdictions Within Their State
  - County, Municipality, Town, Township, Village, Parish, Borough, or Other Unit of General Government
  - 200,000 People or More
- Must Provide Payment Information and a Signed Acceptance of Award Terms Form
  - By January 12, 2021 at 11:59pm Eastern Time
- Tenants and Landlords May Apply Through the Grantee

# EMERGENCY RENTAL ASSISTANCE

## ■ **Eligible Households:**

Income Below 80% of the Area Median Income (AMI);

- Obligation to Pay Rent;
- Reduction of Income Due to COVID-19; and
- At Risk of Homelessness.
- Preferences
  - Unemployed and Not Employed for Past 90 Days.
  - Income Below 50% of the Area Median Income (AMI)

## ■ **Household Income:**

- Income from 2020, OR
- Confirmed Monthly Income at Time of Application

# EMERGENCY RENTAL ASSISTANCE – ELIGIBLE USES

## ■ **Direct Financial Assistance (90%)**

- Rent (3 months going forward),
- Rental arrears,
- Utilities and home energy costs,
- Utilities and home energy arrears, and
- Other expenses related to housing not to exceed 12 months.
- Additional 3 months to stabilize housing if funds available.

## ■ **Housing Stability Services (10%)**

- Case Management
- Other Services for Housing Stability
- Administrative Costs

## ■ **Payment:**

- Directly to Landlord or Utility Provider
- If Refused, Then to Household

# COVID-19 RELIEF – RENTAL ASSISTANCE

## ■ **Rule of Construction**

- Nothing in this section shall be construed to invalidate any otherwise legitimate grounds for eviction.

## ■ **Funds Availability**

- Funds remain available through December 31, 2021.

## ■ **Duplicative of Other Federal Funds**

- To the extent feasible, an eligible grantee shall ensure that 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.

# REPORTING REQUIREMENTS

- Treasury in cooperation with HUD will Issue Public Reports Quarterly on Use of Funds including:
  - the number of eligible households that receive assistance from such payments
  - the acceptance rate of applicants for assistance
  - the type or types of assistance provided to each eligible household
  - the average amount of funding provided per eligible household receiving assistance
  - household income level, broken down by:
    - Below 30% of Area Median Income
    - 30% to 50% of Area Median Income
    - 50% to 80% of Area Median Income
  - the average number of monthly rental or utility payments that were covered by the funding amount that a household received
- All Reporting Areas will be broken down by Gender, Race, and Ethnicity of Primary Applicant.

# STATISTICAL RESEARCH

- All Data Collected for Reporting May be Provided for Statistical Research Under Current Law, including:
  - Personally Identifiable Information
  - At the Census Tract Level
- Grantee Must Establish Data Privacy and Security Requirements
  - Appropriate Measures to Ensure Privacy
  - Information is Only Used for Reporting and Statistical Research
  - Protect Data from Survivors of Intimate Partner Violence, Sexual Assault, or Stalking.

# COVID-19 RELIEF – EVICTION MORATORIUM

- Extension to January 31, 2021
- All aspects of the CDC Eviction Moratorium will remain in place
- Current tenant declarations will remain in effect until January 31, 2021
- New tenant declarations may be provided to landlords until January 31, 2021

# NAHRO POLICY & ADVOCACY CONTACT INFORMATION

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# Emergency Rental Assistance Recap



Government Finance Officers Association

# Grantees

- Total funding: **\$25 billion**
  - State and locals: **\$23.785 billion**
  - Puerto Rico, U.S. Virgin Islands, Guam, the Northern Mariana Islands and American Samoa: **\$400 million**
  - Indian tribes and Native Hawaiians: **\$800 million**
  - Treasury Administration: **\$15 million**

# Distribution Formula

- Based on States proportional rate of the total US population according to the **2019 Census data**
- States will receive **no less than \$200 million**
  - Local governments with a **population of over 200,000** may access **45%** of their state's allocation
- Treasury must **disburse funds within 30 days** of Act's enactment
  - States will receive **no less than 55%** of the funds for their state at that time

# Disbursement of Funds

- Localities seeking direct payment must provide the Treasury Secretary with:
  - A certification signed by the chief executive of the locality within 30 days after the Act's enactment.
- If qualified localities **do not seek** direct grant from Treasury or decline the allocation available to them, Treasury will make those funds available to the states within **15 days** following the closing of the initial 30 day period.

# Administration of Program

- Administered by the Treasury.
- Treasury OIG is responsible for monitoring and oversight of the receipt, disbursement and use of funds.
  - OIG may recoup funds if it determines that a grantee failed to comply.

# Eligible Recipients

- Renter households with incomes no more than 80% of area median income (AMI) meeting the following conditions:
  - One or more individual in the household has
    - qualified for unemployment benefits or
    - has experienced a reduction in household income,
    - incurred significant costs,
    - experienced other financial hardship due directly or indirectly to the COVID-19 pandemic and...
  - One or more individual in the household can demonstrate a risk of experiencing homelessness or housing instability which may include:
    - A past due utility/rent notice or an eviction notice
    - Unsafe or unhealthy living conditions
    - Any other evidence of such risk as determined by the grantee

# Eligible Recipients

- Priority will be given to households with incomes of no more than 50% of AMI and to households in which one or more member is unemployed and has been unemployed for 90 days.
- Landlords and owners may apply on behalf of tenants meeting the eligibility requirements
- **Grantees must ensure that households receiving rental assistance provided under this program do not receive funding under any other federally funded rental assistance program**

# Income Determination

- Grantees must only consider household income for 2020 or confirmation of the monthly income that the household is receiving at the time of application.
- Household income must be **recertified every 3 months** if household is receiving ongoing rental assistance.
- Eligibility for funds after each 3 month period is subject to the availability of remaining funds.

# Eligible Activities

- At least 90% of funds must be used for the following:
  - Rent
  - Rental areas
  - Utilities and home energy costs
  - Utilities and home energy areas
  - Other expenses related to housing incurred directly or indirectly due to the pandemic
- The remaining 10% of funds may be used for housing stability services, including case management or other services related to the COVID-19 pandemic

# Time Limitations

- Payments may not exceed 12 months.
  - Grantee may provide assistance for an additional 3 months (for a total of 15 months) only if necessary to ensure household remains stable and if funding is available.

# Payments

- Payments must be made directly to a lessor or utility/home energy provider on behalf of the eligible household unless the lessor or utility/home energy provider does not agree to accept the payment, in which case the grantee may make payments directly to the eligible household

# Administration Fees

- Up to 10% of each grantee's funds may be used for administrative expenses for providing assistance under this program.
  - Including for data collection and reporting requirements.

# Time Frame

- Treasury will recapture any funds **not obligated by September 30, 2021.**
- Treasury will reallocate the recaptured amount to grantees who, at that time will have **obligated at least 65%** of their original grant.
- The amount of reallocation will be based on demonstrated need:
  - Available until **December 31, 2021**, after which grantees **must request an extension of up to 90 days after 2021.**

# Reporting Requirements

- Following information required from each grantee's programs:
  - Number of eligible households that receive assistance
  - Acceptance rate of applicants for assistance
  - Type of assistance provided to each household
  - Average amount of funding provided per household
  - Incomes of eligible households by income tier (**less than or equal to 30% of AMI, between 30-50% of AMI, between 50-80% of AMI**)
  - Average number of monthly rental/utility payments that each household received

# Reporting Requirements

- Data of applicant must be disaggregated by:
  - gender
  - race
  - ethnicity
- Grantees must establish privacy and security requirements.
- Alternative settings might be set for Native American tribal entities and Native Hawaiians.

# Question and Answer Session



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