



Washington State
Department of
Commerce

Guidelines

FOR THE

Treasury Rent Assistance Program (T-RAP)

March 1, 2021 through December 31, 2021

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1 Grant Basics

1.1 Overview

The Treasury Rent Assistance Program (T-RAP) Grant is part of Washington State's response to the COVID-19 pandemic. Funds are intended to prevent evictions that would contribute to the spread of the virus by paying past due, current due, future rent, and utilities, targeting limited resources to those who have experienced financial hardship due to the COVID-19 outbreak and are at risk of experiencing homelessness or housing instability.

The T-RAP Guidelines Questions & Answers (Q&A) are posted on the Commerce website : <https://www.commerce.wa.gov/serving-communities/homelessness/cares-act-and-state-rent-assistance/>

1.2 Program Goals

The program goals are:

- ✓ Prevent evictions.
- ✓ Target resources to very low income households who are unemployed.
- ✓ Promote equity in who is served, with a focus on equity for groups of people who historically have not been provided equitable access to rent assistance and those who have disproportionately been impacted by the COVID-19 outbreak: Latinx or Hispanic, young adults, Black or African American, American Indian and Alaska Native, Native Hawaiian or other Pacific Islander.

1.3 Program Purpose

The Office of Family and Adult Homelessness in the Housing Assistance Unit at the Department of Commerce administers state and federal funds to support homeless crisis response systems in Washington State.

The Treasury Rent Assistance Program is a critical resource in Washington State's response to the COVID-19 pandemic.

We expect Commerce grantees, including county governments and nonprofits, to be leaders, facilitating partnership among service organizations and promoting evidence-based, anti-racist practices.

Grantees must respond to the disproportionality in access to services, service provision and outcomes and cannot simply rely on standard business practices to address inequity. Grantees have the responsibility to ensure all people eligible for services receive support and are served with dignity, respect and compassion regardless of circumstance, ability or identity.

This includes marginalized populations, Black, Native and Indigenous, People of Color, immigrants, people with criminal records, people with disabilities, people with mental health and substance use vulnerabilities, people with limited English proficiency, people who identify as transgender, people who identify as LGBTQ+, and other individuals that may not access mainstream support.

We are here to support your efforts. The Housing Assistance Unit provides access to continuous learning on trauma informed services, racial equity, LGBTQ+ competency and more. We can help you strategize outreach, coordinated entry and help you understand your data so we can meet Washington’s vision that no person is left living outside.

1.4 Authorizing Statute and Fund Sources

Federal Coronavirus Response and Relief Supplemental Appropriations Act.

2 Household Eligibility

There isn’t enough funding to assist all of the households who may be eligible for rent assistance under this program. The purpose of the eligibility screening criteria is to target those most likely to become homeless but for this assistance.

Households must meet all three of the initial screening criteria:

- ✓ Income at or below 80% of [Area Median Income](#) (AMI).¹
- ✓ Experiencing a financial hardship directly or indirectly due to the COVID-19 outbreak that threatens the household’s ability to pay the costs of the rental property when due.¹
- ✓ At risk of experiencing homelessness or currently experiencing housing instability.¹

Eligibility criteria must be documented and kept in the household file. *See **Section 3 and the Household Information and Eligibility Form** for more information on documentation standards.*

The following households must be prioritized:

- ✓ Income at or below 50% Area Median Income (AMI).¹
- ✓ Households with one or more individuals who are unemployed and have been unemployed for 90 days before application date.¹

United States citizenship is NOT an eligibility requirement of this program.

¹ U.S. Department of the Treasury specific guidance

For the purposes of this program a household is the person or people that are obligated to pay rent on a residential dwelling and are seeking assistance together. Roommates sharing a residence, but who each have a separate lease, are not considered a household.

Households in informal rental agreements (e.g. staying with family/friends or in a motel long term) are able to receive financial assistance. *See Section 3.4 Documenting Current Rent and Arrears for more information on collecting leases and when a lease is unavailable.*

Households residing in subsidized housing are able to receive assistance if funds are not applied to costs that have been or will be reimbursed under any other assistance. If an eligible household receives a monthly federal subsidy (e.g., a Housing Choice Voucher, Public Housing, or Project-Based Rental Assistance) and the tenant rent is adjusted according to changes in income, the renter household may receive T-RAP assistance for the tenant-owed portion of rent or utilities that is not subsidized. ¹

Assistance received through this program should not count as a public benefit for the purpose of determining whether someone is considered a public charge. Public charge refers to non-US citizens who have received one or more public benefits, for more than 12 months within any 36-month period. A person considered a public charge is ineligible to become a lawful permanent resident.

Rental assistance provided through this program shall not be regarded as income.¹ Rent assistance received through this program is not regarded as a resource for purposes of determining the eligibility of the household or any member of the household for benefits or assistance, or the amount or extent of benefits or assistance, under any Federal program or under any State or local program financed in whole or in part with Federal funds.¹

3 Documenting Household Eligibility

Household eligibility must be documented using the ***Commerce T-RAP Household Information & Eligibility Form***. This Form and accompanying documentation must be kept in the household file and made available to Commerce on demand to confirm grant compliance. Grantees must require all applications for assistance to include an attestation from the applicant that all information included is correct and complete.¹ See Form for more detailed information on documentation standards for each requirement.

If a household received financial assistance in the last 60 days and re-applies for assistance, their Household Information and Eligibility Form and documentation are still valid for additional services. If 60 days has passed, they need new eligibility paperwork. In either case, new Payment Forms are necessary for additional rent payments made on their behalf.

The most current version of the Form can be found at <https://www.commerce.wa.gov/serving-communities/homelessness/cares-act-and-state-rent-assistance/>.

3.1 Income

To determine income eligibility, grantees must consider the household's total gross income for calendar year 2020 or the household's current monthly income at the time of application.¹ Income verified for the calendar year 2020 does not need to be re-verified.¹

If a household qualifies based on monthly income, the grantee must re-verify income eligibility every three months for the duration of assistance.¹

Gross Income is the amount of income earned before any deductions (such as taxes and health insurance premiums) are made.

3.1.1 Allowable Income Documentation

3.1.1.1 Source Documentation

Grantees should collect source documentation for income determinations when possible.¹ This can include paystubs, W-2s or other wage statements, tax filings, bank statements demonstrating regular income, or an attestation from an employer.¹

An attestation from an employer should include the employees name, employers name, pay amount and frequency, average hours worked per week, amount of any additional compensation.¹

Source documentation can also include a determination letter/statement from another local, state, or federal government assistance program that verified the household income on or after January 1, 2020.¹

Source documentation is flexible and can include photocopies or digital photographs of documents, e-mails, or attestations from employers, landlords, caseworkers, or others with knowledge of the household's circumstances.¹

Electronic signatures for all documentation types are allowable.

3.1.1.2 Written Self-Declaration

Under limited circumstances, a grantee may rely on a written self-declaration from the household without income source documentation.¹ Grantees have discretion to allow for self-declarations when accommodating disabilities, extenuating circumstances related to the pandemic, a lack of technological access, or when a household's income, or a portion of it, is not verifiable due to the impact of COVID-19, has been received in cash, or the household has no qualifying income.¹

When appropriate, grantees may rely on an attestation from a caseworker or other professional with knowledge of a household's circumstances to certify their income eligibility.¹

When a written self-declaration is used in place of source documentation, the grantee must re-

verify household income every three months for the duration of assistance.¹

If relying on a self-declaration to document income eligibility, use the ***T-RAP Self Declaration Form***.

3.1.1.3 Annualizing Income

Use one of the following calculations to convert the wage into annual income:

- ✓ Hourly wage multiplied by hours worked per week multiplied by 52 weeks.
- ✓ Weekly wage multiplied by 52 weeks.
- ✓ Bi-weekly (every other week) wage multiplied by 26 bi-weekly periods.
- ✓ Semi-monthly wage (twice a month) multiplied by 24 semi-monthly periods.
- ✓ Monthly wage multiplied by 12 months.

3.2 Housing Status

One or more individuals in the household must demonstrate a risk of experiencing homelessness or currently experiencing housing instability. This must be documented and may include:

- ✓ A past due utility notice or eviction notice, or¹
- ✓ Statement from the landlord that verifies the household's housing instability (currently late on rent and/or has rental arrears). Verbal verification is allowable, use Household Information and Eligibility Form, or
- ✓ Self-declaration signed and dated by the household that verifies the applicant's housing instability (currently late on rent and/or has rental arrears, past due utilities, other housing instability details).

3.3 Financial Hardship

One or more individuals in the household must have qualified for unemployment benefits, experienced a reduction in income, incurred significant costs, or experienced other financial hardship due directly or indirectly to COVID-19 that threaten the household's ability to pay the costs of the rental property when due.¹ This must be documented and may include:

- ✓ For documenting unemployment benefits:
 - Copy of most recent payment statement or benefit notice, or,¹
 - Dated mail, fax, email verification, or verbal verification from unemployment administrator that includes amount, or
 - Written self-declaration signed by the applicant that one or more members of the household meets this condition.¹
- ✓ For documenting all other types of financial hardship:
 - Written self-declaration signed by the applicant that one or more members of the household meets this condition.¹

3.4 Documenting Current Rent and Utility Arrears

3.4.1 Rent Payment Agreement Form

The **Commerce T-RAP Rent Payment Agreement Form** must be completed for households seeking rent assistance. This form and accompanying documentation must be kept in the household file and made available to Commerce on demand to confirm grant compliance.

Landlords can initiate T-RAP financial assistance on behalf of their tenants.¹ Directions for landlords are detailed on the Form. The provider must still verify the household's eligibility.¹

Landlord's initiating assistance must:

1. Provide the tenant with a copy of the Form, and¹
2. Accept any payments received as satisfaction of the tenant's rental obligations, and¹
3. Ensure the tenant signs the Payment Agreement Form at some point in the process. This can be initiated by the landlord or a grantee.¹ Electronic signatures are allowable.

Please ensure you are using the most current version of the Form by visiting the website at: <https://www.commerce.wa.gov/serving-communities/homelessness/cares-act-and-state-rent-assistance/>

3.4.2 Leases

Grantees must collect, if available, a current lease signed by the applicant household and the landlord or sublessor that identifies the unit where the applicant resides and establishes the rental payment amount.¹ The entire lease document doesn't need to be provided as long as the tenant and landlord signatures, payment amounts, and rental address are identified.

A lease is a document that contains the following components:

- ✓ Name of tenant
- ✓ Name of landlord
- ✓ Address of rental property
- ✓ Occupancy (who gets to live at the rental)
- ✓ Term of agreement (lease start and end date)
- ✓ Rent rate and date due
- ✓ Deposits (if any and what for/term)
- ✓ Signature of tenant/date
- ✓ Signature of landlord/date

3.4.2.1 Rental Address

In the absence of a lease, documentation of residence may include evidence of paying utilities for the residential unit, an attestation by a landlord who can be identified as the verified owner or management agent of the unit, or other reasonable documentation as determined by the grantee¹ including a written self-declaration of rental location from the household.

3.4.2.2 Rental Payment Amount

In the absence of a lease, evidence of the amount of a rental payment may include bank statements, check stubs, or other documentation that reasonably establishes a pattern of paying rent, a written attestation by a landlord who can be verified as the legitimate owner or management agent of the unit, or other reasonable documentation as defined by the grantee in its policies and procedures.¹

In cases where the household does not have source documentation of the rental payment amount and uses a written self-declaration from the household, the monthly maximum amount of assistance must be 100% of the greater of the [Fair Market Rent or the Small Area Fair Market Rent](#) for the area in which the applicant resides.¹ In this case, such assistance may only be provided for three months at a time, and the grantee must obtain source documentation of monthly rent after three months in order to provide further assistance.

4 Allowable Expenses

4.1 Administration and Operations

Grantees are charged with determining whether or not an expense is eligible based on federal CARES Act [guidance](#) including the U.S. Department of the Treasury Eviction Rent Assistance [guidance](#).

An administrative or operations cost is eligible if either (a) the cost cannot lawfully be funded using a line item, allotment, or allocation within your agency budget or (b) the cost is for a substantially different use from any expected use of funds in such a line item, allotment, or allocation. For example:

- **Administrative** costs are allowable if they are direct expenses related to delivering financial assistance, housing stability, and meeting reporting requirements.¹
- **Operations**, the administration of the T-RAP grant, is allowable.¹

Below is an eligibility cost test that may also help with determining if a cost is allowable. If all responses for the particular incurred cost are “true” for all five statements below, then a grantee can feel confident the cost is eligible:

- The expense is connected to the COVID-19 emergency.
- The expense is “necessary”.
- The expense is not filling a short fall in government or agency revenues.
- The expense is not funded thru another budget line item, allotment or allocation, as of March 27, 2020.
- The expense wouldn’t exist without COVID-19 OR would be for a “substantially different” purpose.

Grantees have the authority and flexibility to determine “necessary” or “substantially different.”

Many costs are clearly eligible and others are in more of a grey area. One could probably justify some of the “grey area” costs based on the test, but are they directly addressing the immediate impacts? Possibly not. In these situations it may be safer and more appropriate to utilize another more flexible fund source.

Indirect costs are not allowable.¹

4.2 Rent and Utilities

Households can receive up to 12 months of financial assistance.¹ Financial assistance can include a combination of rent and utility arrears, current rent and utility payments, future rent payments, and other housing costs related directly or indirectly to COVID-19.¹

Rent

Rent arrears are when any rent payment is missed or past due, including when the current month’s rent is past due. Assistance cannot be provided for arrears that were accrued before March 13, 2020.¹

Future rent is the rent *after* the current month and can be made up to three months at a time.¹

- ✓ Households can receive assistance with future rent only, if the household does not have rental arrears and/or the provider has already assisted the household with rental arrears.¹

An additional three months of rent assistance can be provided if the household reapplies and is still experiencing housing instability, and has not already received the maximum amount of assistance (15 months).¹

- ✓ After 12 months of assistance has been provided, households can receive an additional three months of financial assistance, totaling 15 months, if necessary to ensure housing stability.¹

Utilities

Utilities and home energy costs are separately-stated charges related to the occupancy of rental property. They can include electricity, gas, water and sewer, trash removal and energy costs, such as fuel oil. Utilities that are covered by the landlord within rent will be treated as rent. Utility only payments are allowable. Future utility payments are not allowable.¹ All payments for utilities and home energy costs should be supported by a bill, invoice, or evidence of payment to the provider of the utility or home energy service.¹

Other housing costs include relocation expenses and rental fees (if a household has been temporarily or permanently displaced due to the COVID-19 outbreak), reasonable accrued late fees (if not included in rental or utility arrears and if incurred due to COVID-19), and Internet service provided to the rental unit. Internet service provided to a residence is related to housing and is in many cases a vital service that allows renters to engage in distance learning, telework, telemedicine, and obtain government services.¹ Grantees should adopt policies that determine when covering this cost would be appropriate.¹

All payments for housing-related expenses must be supported by documentary evidence such as a bill, invoice, or evidence of payment to the provider of the service.¹

4.2.1 Calculating Maximum Rent Payment

Payments can be up to 150% of [Fair Market Rent](#) (FMR) and must not be more than the total amount due. FMR calculations do not need to include the cost of utilities.

In cases where the household does not have source documentation of the rental payment amount and relies on a written self-declaration from the household, the monthly maximum amount of assistance must be 100% of the greater of the Fair Market Rent or the Small Area Fair Market Rent for the area in which the applicant resides.¹ In this case, assistance may only be provided for three months at a time and the household must also attest that they have not received, and does not anticipate receiving, another source of public or private subsidy or assistance for the rental costs that are the subject of the attestation.¹ Grantees must obtain source documentation of the rental payment amount after three months in order to provide further assistance to the household.¹

See the ***Commerce T-RAP Household Information and Eligibility Form*** for details on how to document.

4.2.2 Payments

Documentation of payments made to a landlord or utility provider on behalf of the household must be provided to the household.¹

If the landlord or utility provider does not agree to accept payment from the grantee after outreach by the grantee, or the landlord cannot be reached, the grantee may make payments directly to the household for them to provide to the landlord or utility provider themselves.¹

Grantees must make reasonable efforts to obtain the cooperation of landlords and utility providers to accept payments. Outreach will be considered complete if:

- ✓ A request for participation is sent in writing, by certified mail, to the landlord or utility provider, and the addressee does not respond to the request within 14 calendar days after mailing; or¹

- ✓ If the grantee has made at least three attempts by phone or email over a 10 calendar-day period to request the landlord or utility provider’s participation. All efforts must be documented. The cost of the mailing is an eligible administrative cost.¹

The final outreach attempt or notice to the landlord must be documented.¹

For payments made directly to households, grantees must have systems in place to ensure there is no duplication of payment.¹

5 Local Variance

Grantees interested in implementing program restrictions or additional eligibility requirements must ensure they are based on vulnerability and/or risk. Grantees must first consult with their Commerce T-RAP grant coordinator before implementing. Examples include but are not limited to:

- ✓ Restricting income eligibility to less than 80% AMI (for example, using 50% AMI for eligibility and not just prioritization).
- ✓ Providing less than three months of future rent payments.
- ✓ Prioritizing households that are severely rent burdened.

6 Coordinated Entry

Lead grantees and subgrantees funded by this grant are not required to participate in the county or regional Coordinated Entry (CE) process for the purpose of this grant.

To support effective partnerships, grantees should actively create and maintain relationships with CE. Additionally, grantees should refer households to CE when their needs cannot be met by this grant assistance.

7 Grant Requirements

7.1 Performance Measures

Grantees must work to ensure equitable access to T-RAP.

Equitable access means that the race and ethnicity of people entering T-RAP are similar to the community demographics. Equitable access is measured by comparing the percent of people in poverty by race and ethnicity to the percent of people entering T-RAP by race and ethnicity.

The percentage of head of households provided rent assistance must at least equal the proportion to the population living in poverty in the county for each of the following groups:

- ✓ People of Color (includes Black or African American, American Indian and Alaska Native, Native Hawaiian or other Pacific Islander, Hispanic/Latinx, Asian, Other/Multi-Racial)
- ✓ Black or African American
- ✓ American Indian and Alaska Native
- ✓ Hispanic/Latinx

Additional performance target includes:

- ✓ Ten percent of households served must be youth or young adults age 18-24, *this includes emancipated 16 and 17 year olds.*

Data from all T-RAP grantees in the county will be combined for the purpose of performance measurement and performance monitoring.

Strategies to promote equity in services:

- Affirmatively market the program.
- Outreach to and develop meaningful connections with tribal communities, farmworkers and other marginalized communities.
- Demonstrate a commitment to hiring and promoting people from communities who are most impacted by COVID in your community.
- Provide interpretation services to ensure effective communication with people who have limited English proficiency.
- Translate all documents and marketing information (including website) into the most common languages spoken by those impacted by COVID in your community.
- Offer flexible intake and services such as mobile services, virtual services and outreach-based services.
- Ensure direct services staff have relevant cultural humility training and educational materials.

Grantees can review the performance targets for their service area by visiting the website at: <https://www.commerce.wa.gov/serving-communities/homelessness/cares-act-and-state-rent-assistance/>.

7.2 By and For Sub Grants

Grantees must actively work to partner with By and For organizations in their communities that assist and serve marginalized populations. It is incumbent on the grantee to identify By and For service providers that can best support their community members in accessing assistance.

By and For organizations are operated by and for the community they serve. Their primary mission and history is serving a specific community and they are culturally based, directed, and substantially controlled by individuals from the population they serve. At the core of their programs, the organizations embody the community's central cultural values. These communities may include ethnic and racial minorities; immigrants and refugees; individuals who identify as LGBTQ+, individuals with disabilities or who are deaf; and Native Americans.

Funds provided to sub grant to By and For organization/s can cover the costs associated with program outreach and assistance to marginalized communities. This can include acting as a referral source, outreach to marginalized communities, providing rental assistance to households directly, or other Operations activities related to T-RAP.

Marginalized communities may include ethnic and racial minorities; immigrants and refugees; individuals who are lesbian, gay, bisexual, and transgender; individuals with disabilities or who are deaf; and Native Americans.

7.3 Dispute Resolution Center Partnerships

Grantees must coordinate with their local Dispute Resolution Centers (DRC) if one exists within their service area. DRCs can be an important pathway to prevent evictions, and providing rent assistance can be critical to settling disputes.

There are many ways to partner with a DRC. The following list is not comprehensive and grantees should work towards a partnership that makes sense for their community.

- ✓ Subcontract to your local DRC to provide rent assistance.
- ✓ Train DRC staff on T-RAP paperwork.
- ✓ Utilize the DRC as a referral source for T-RAP applicants.
- ✓ Engage with DRC staff to help resolve communication challenges between landlords and households.
- ✓ Invite DRC staff to participate in rent assistance provider meetings.
- ✓ Partner households with DRC staff to help establish repayment plans when appropriate.
- ✓ Work with DRC mediators and staff to provide training opportunities to rental assistance providers, landlords, and tenants on the following:
 - Communication to prevent escalation
 - Collaboration for mutual gain
 - Collaborative negotiation
 - Feedback for positive landlord/tenant relationship

7.4 Language Assistance Services Requirement

Lead/subgrantees are required to ensure their customers with disabilities and those with limited English proficiency have access to vital information, and are responsible for ensuring meaningful language assistance services. This requirement can be fulfilled using 1) in-person interpretation: spoken and sign language or 2) remote interpretation using phone or video. Language interpretation costs are an eligible use of grant funds.

The following is a list of organizations that provide language interpretation services over the phone. This is not a comprehensive list or an endorsement of the services they provide; other organizations may be better suited to fulfill the language interpretation requirement:

Lionbridge: <https://www.lionbridge.com/content-transformation-services/interpretation-services/>

Language Link: <https://www.language.link/telephonic-interpretation/>

Linguistica: https://www.linguisticainternational.com/services/over_the_phone/

Commerce will assist with language access by translating the required public facing Forms into multiple languages, and can assist grantees with translation of other written materials as requested.

7.5 Changes to Guidelines

Commerce may revise the guidelines at any time. All lead grantees will be sent revised copies. Lead grantees are responsible for sending revisions to subgrantees in a timely manner.

7.6 Fiscal Administration

7.6.1 Invoicing and Due Dates

Grantees must invoice Commerce at least monthly, and can invoice as frequently as weekly, for reimbursement of allowable costs. Invoices are due on the 20th of the month following the provision of services. Final invoices with expenses through December 31, 2021 are due January 30, 2022.

Commerce will monitor spending regularly to help ensure grantees are on track to spend out at least 65 percent of their award by September 30, 2021.

Beginning on September 30, 2021, the Department of Treasury will determine which grantees have obligated at least 65 percent of their award and reallocate the unobligated funds.¹ The amount of any such reallocation shall be determined based on demonstrated need within a grantee's jurisdiction.¹

In August, Commerce will plan reallocations to meet the federal spending deadline. Grantees that do not meet the invoice deadlines will be subject to grant budget reductions and funds will be reallocated.

Invoices must be submitted online using the Commerce Contract Management System (CMS) through Secure Access Washington (SAW).

7.6.2 Budget Revisions

Grantees can move funds between budget categories without needing an amendment. Submit budget revisions to your T-RAP Grant Coordinator via email for approval. The following restrictions on budget revisions apply:

Budget Category	Move to Other Category
Admin and Operations	Yes

Rent and Utility Assistance	No
By and For Subcontracting	No

8 Additional Requirements

8.1 Ineligible Use of Funds

Lead/subgrantees must inform Commerce if grant funds are spent on ineligible households or expenses. Reasonable attempts must be made to prevent ineligible use of funds.

8.2 Policies and Procedures (P&P)

The following policies and procedures are required and recommended for T-RAP grantees administering financial assistance.

8.2.1 Required P&P

8.2.1.1 Grievance Procedure

Grantees must have a written grievance procedure for households seeking or receiving services which includes the household's right to review decisions and present concerns to program staff not involved in the grievance. This procedure must clearly describe how households can request a review or report concerns and be accessible to all households seeking or receiving services.

8.2.1.2 Termination and Denial of Service Policy

Grantees must have a termination and denial policy. This policy must describe the reasons a household would be denied services and/or terminated from program participation, describe the notification process, and ensure households are made aware of the grievance procedure.

8.2.1.3 Written Self-Declaration Policy

Grantees must specify under what circumstances they will accept written self-declarations from the household without further documentation to determine any aspect of eligibility or the amount of assistance, and in such cases, grantees must have in place reasonable validation or fraud prevention procedures to prevent abuse.¹

8.2.1.4 Eligibility and Prioritization Policy

Grantees must document their policies and procedures for determining a household's eligibility to include policies and procedures for determining the prioritization of households in compliance with the statute and maintain records of their determinations.¹

8.2.2 Recommended P&P

8.2.2.1 Unsafe or Unhealthy Living Conditions

Grantees should adopt policies and procedures addressing how they will determine the presence of unsafe or unhealthy living conditions and what evidence of risk to accept in order to support their determination that a household satisfies this requirement.¹

8.2.2.2 Internet Costs

Grantees should adopt policies that govern in what circumstances that they will determine that covering internet costs would be appropriate.¹

8.2.2.3 Prioritization Policy

As part of the Prioritization Policy, grantees should document the preference system (for 50% AMI and unemployed) they plan to use and should inform all applicants about available preferences.¹

9 Appendix

9.1 Reporting

Grantees are required to provide quality data to the best of their ability. Maintaining good data quality is important for effective program evaluation.

- ✓ Grantees within non-Balance of State CoCs may choose to report data in HMIS, but must still complete the Commerce T-RAP Report Form.
- ✓ Grantees within the Balance of State Continuum of Care (CoC) must not enter program data into HMIS. Enrollment into an existing CE project is allowable

Grantees must establish data privacy and security requirements for the information collected above that include appropriate measures to ensure that the privacy of the individuals and households is protected, that the information is collected and used only for the purpose of submitting reports, and provide confidentiality protections for data collected about any individuals who are survivors of intimate partner violence, sexual assault, or stalking.¹

9.1.1 Information to Retain

Grantees must retain the following information:

Information to Retain	Located On
Landlord's name, address, social security number, tax identification number or DUNS number ¹	Rent Payment Agreement Form
Utility provider's name, address, social security number, tax identification number or DUNS number ¹	Utility Payment Agreement Form
Address of rental unit and city ¹	Rent Payment Agreement Form and Utility Payment Agreement Form

9.1.2 Information to Submit

Grantees must compile the following information using the T-RAP Report Form and email monthly, by the 20th of each month, following the month of service. Grantees must compile all subgrantee information into one report when submitting.

Grantees using local systems to store data may elect to produce a report rather than use the provided T-RAP Report Form. This is allowable if produced in an Excel or CSV file with the data elements listed below. Additionally, reports must be submitted with the same column labels as the T-RAP Report Form.

Summary Information	Located On	T-RAP Monthly Report Tab
Service Month <i>Enter the service month that the report represents. For example: If rents were paid in April 2021, the service month is April 2021 regardless of the rental arrear periods covered.</i>	Rent Payment Agreement Form	Column B
Number of Households Applied¹ <i>Enter the number of households who applied for the TRAP program in the service month.</i>	Internal Tracking	Column B
Number of Households that Received Assistance¹ <i>Enter the number of household that received TRAP assistance (rent or utility assistance) in the service month. This number should equal the number of filled rows on the Household Info Tab.</i>	Internal Tracking and →	Column B
Household Information	Populate From	Household Info Tab
Household ID <i>Create a unique household ID that your organization can connect to household documentation. You can use your own method for creating a Household ID. Do not use identifying information such as initials, name or social security number.</i>	Household Information and Eligibility Form	Column B
Youth & Young Adult Households <i>Select YES if the head of household is age 18-24, or 16-17 year old unaccompanied youth.</i>	Household Information and Eligibility Form	Column C
Gender, Race and Ethnicity¹ <i>Use the drop downs to select the gender, race and ethnicity of the head of household. Gender, race and ethnicity are self-identified. Staff observations should never be used to collect information on gender, race and ethnicity. Provide all options to every head of household applying .</i>	Household Information and Eligibility Form	Columns D-F

<p>Number of Household Members Enter the total number of household members, including the head of household.</p>	Household Information and Eligibility Form	Column G
<p>Number of Household Members Under 18 Enter the total number of household members under the age of 18. Include the head of household if they are under the age of 18.</p>	Household Information and Eligibility Form	Column H
<p>Total Monthly Income¹ See section 3.1 on income.</p>	Household Information and Eligibility Form	Column I
<p>Household AMI Tier¹ Select the income tier for the household.</p> <ul style="list-style-type: none"> • 30 percent AMI or less • Between 30 percent AMI and 50 percent AMI • Between 50 percent AMI and 80 percent AMI <p>To determine AMI go to https://www.huduser.gov/portal/datasets/il/il2020/select_Geography.odn and "Click Here for FY 2020 IL Documentation". Select Washington - WA. Then select a county. Click "View County Calculations". Use the household's annual income and number of household members to determine the income tier.</p>	Household Information and Eligibility Form	Column J
<p>Monthly Rent Amount¹ Enter the household's total monthly rent amount.</p>	Rent Payment Agreement Form	Column K
<p>Total Amount of Outstanding Rental Arrears¹ Enter the household's total rent arrears amount before any assistance since March 13, 2020.</p>	Rent Payment Agreement Form	Column L
<p>Total Amount of Rental Arrears Paid and Number of Months¹ Enter the total amount of rental arrears paid for the household by the T-RAP program. Enter the number of months represented in the total payment of rental arrears. Rental arrears includes current rent.</p>	Rent Payment Agreement Form	Columns M and N
<p>Total Amount of Future Rent Paid and Number of Months¹ Enter the total amount of future rent paid for the household by the T-RAP program. Enter the number of months represented in the total payment of future rent.</p>	Rent Payment Agreement Form	Columns O and P
<p>Total Amount of Outstanding Utility and Home Energy Cost Arrears¹ Enter the household's total utility arrears amount before any assistance since March 13, 2020.</p>	Utility Payment Agreement Form	Column Q

<p>Total Amount of Utility and Home Energy Arrears Paid and Number of Months¹</p> <p><i>Enter the total amount of utility and home energy cost arrears paid for the household by the T-RAP program. Enter the number of months represented in the total payment of utility and home energy cost arrears. Arrears includes current utility and home energy costs.</i></p>	<p>Utility Payment Agreement Form</p>	<p>Columns R and S</p>
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