



Treasury Rent Assistance Program (T-RAP 1.0 and T-RAP 2.0)

Questions & Answers

2022, Version 7

Please note that Other Housing Costs are referred to as OHC throughout this document.

Allowable Expenses

Updated 10/2021- Please clarify **Other Housing Costs (OHC)**. For T-RAP 1.0 OHC are related to housing and incurred directly or indirectly due to the COVID-19 pandemic. For T-RAP 2.0 OHC only need to be related to housing. These costs can include relocation expenses, fees not included in the monthly rent payment, internet service provided to the rental unit, and short term hotel/motel stays. For a household to receive assistance with a short term hotel/motel stay, they must have been temporarily or permanently displaced from their primary residence. If assisting a household with a short term hotel/motel stay, the displacement should be documented in the household's file.

Are utilities that are collected by a third party for large property management company an eligible expenses? Yes. Please note that even if the utilities are collected by a third party, if they are part of the tenant's monthly rent payment they should be included as rent.

Are utility arrears only payments allowed? Yes.

Assistance cannot be provided for arrears that were accrued before March 13, 2020. What does that mean for the unpaid rent? Any rent or utility arrears that were accrued prior to March 13, 2020 cannot be covered by this assistance. You can prorate the arrears from March 13-March 31 and pay this portion.

If a past due utility bill has reverted back to the landlord for payment, can the landlord get that paid when initially it was the tenant's responsibility? The landlord can encourage their tenant to still apply for assistance for the utility arrears. We hope that the utility company would still accept payment on behalf of the tenant if the account originally belonged to them. If the landlord already paid the bill because it reverted back to them, they would not be eligible for reimbursement through T-RAP.

Would utility customers that received energy assistance from LIHEAP and LIHEAP CARES qualify for additional benefits from this program? Yes, as long as the payments are not duplicative. People who have received previous utility assistance from any program are eligible to receive assistance for outstanding bills.

Updated 10/2021- **Is there 10% admin and ops built into the By and For category?** For both T-RAP 1.0 and 2.0, the By and For organization's admin expenses cannot exceed 15%.

Do stimulus checks count as income when determining income eligibility? What about enhanced unemployment benefits due to COVID-19? No, this is temporary, nonrecurring or sporadic income which does not need to be considered for income eligibility.

Can we use OHC to help households establish internet if they don't already have it? Yes. And grantees providing internet service should adopt policies that govern in what circumstances they will determine that covering internet costs is appropriate.

Updated 10/2021- **Can we provide relocation assistance in the form of costs related to moving a household's belongings, storage fees, or transportation (plane or train tickets, gas money) to a new location due to a job change or need for services in another community?** Yes, these are allowable examples of relocation assistance under OHC. If the costs are related to housing and incurred directly or indirectly due to COVID-19, they can be covered with T-RAP 1.0. If they're related to housing but not COVID-19, they can be covered with T-RAP 2.0.

Updated 10/2021- **If a household is doubled up or couch surfing, can T-RAP funds be used to help with a security deposit and 3 months of future rent for the household to move to their own residence?** Yes, deposits for a new unit are an allowable expense under OHC, and 3 months of future rent are an allowable type of Rent assistance. Please note the different eligibility requirements for OHC with T-RAP 1.0 and T-RAP 2.0, the different payment agreement forms for OHC and Rent, as well as the different reporting requirements.

Does a utility bill have to be in the household's name, in the event of subleasing? In other words, if a household is responsible for a utility, but it is not under their name can we pay for it? No, it doesn't have to be in their name. Providers should document to the best of their ability that the tenant is responsible for the bill.

If a household is renting 1 room in a home and the utilities are behind, can we pay for the whole utility bill or will we have to pay the household's portion? This is at the discretion of the grantee but it is allowable to pay the entire bill.

Updated 10/2021- **Can T-RAP pay for garage fees or parking fees?** If the fee is included as an expense in the lease (including a cost incurred due to violating the lease) it can be included as Rent. If it is a stand-alone fee it can be covered under OHC. It is important to determine which category the fee fits into in order to record it appropriately on forms, and please note the different eligibility criteria for OHC for T-RAP 1.0 and T-RAP 2.0.

If we assist with a household's deposit that includes their last month of rent, do we count that as future rent? No.

Do we need to consider deposits when determining FMR? No.

If we pay someone's deposit does it count towards the number of months of financial assistance? Yes, deposits are financial assistance under OHC and must be counted.

Updated 10/2021- In what circumstances is a hotel/motel stay considered rent? In what circumstances would it be considered OHC? A hotel/motel stay is considered rent if it is part of a long-term living arrangement which can be substantiated by verification from the household and the hotel/motel. A hotel/motel stay is considered OHC when it is short-term and used for a household that has been displaced from its primary residence. If assisting a household with a short term hotel/motel stay, the displacement should be documented in the household's file.

Updated 10/2021- We have a landlord that is trying to apply an eviction fee from March 2021 when they thought the moratorium was ending. Can we pay that fee? No, RCW 59.18.620(1) prohibits landlords from charging late fees for rent that was due "between March 1, 2020, and six months following the expiration of the eviction moratorium." The "eviction moratorium" that SB 5160 refers to is Proclamation 20-19.6, which expired on June 30, 2021. Six months from that date is December 31, 2021. We encourage you to refer your tenant to civil legal aid or dispute resolution services to discuss any fees or eviction notices tenants may have received under the moratorium. A gentle reminder from the provider to the landlord that these fees aren't allowable might also be helpful.

Can we pay a utility bill that is dated in the future, but the due date is in the current month? Yes.

Updated 10/2021- Is it okay to use hotel as OHC for longer than just a few days? The relocation to a new unit may take several weeks. Yes. A hotel/motel stay is considered OHC when it is short-term and part of relocation expenses such as a need to stay in a hotel for a few days between moving from one apartment to another. This is allowable when a household has been displaced from its primary residence. If assisting a household with a short term hotel/motel stay, the displacement should be documented in the household's file.

Can we assist a client with their portion of utility arrears only, when the account has more than one service address? Yes, if the utility bill for a multi-family dwelling has more than one service address on it, you would pay only for the portion that belongs to the household.

Updated 10/2021- When the lease has a base rent + parking fees, do those parking fees fall in as rent or as OHC? If the fee is included as an expense in the lease and paid as part of rent each month, it can be included as Rent. If it is a stand-alone fee it can be eligible under OHC. It is important to determine which category the fee fits into in order to record it appropriately on forms. Please note the different eligibility criteria for OHC for T-RAP 1.0 and T-RAP 2.0.

Updated 10/2021- Do we put first month's rent and deposit on the rent payment form if we help a household relocate? If you assist with a household's deposit and the deposit includes their first and/or last month of rent, that falls under OHC and should be on the OHC Payment Form. Please note the different eligibility criteria for OHC for T-RAP 1.0 and T-RAP 2.0.

If we assist with relocating a household and pay their deposit, can we pay future rent at the same time? Would the months of future rent be considered OHC? Yes, T-RAP can help with

future months of rent in the new residence. However, future rent is not considered OHC and should be recorded on the Rent Payment Form.

If we assist a household with a deposit and first month's rent, does that count as 2 months of financial assistance? No. If the assistance occurs within the same month for both the deposit and the first month of rent, this is only 1 month of assistance.

Are pet fees allowable for OHC? If the fee is included as an expense in the lease and paid with rent each month, it can be included as Rent. If it's a fee outside of the lease it could be eligible under OHC. It is important to determine which category the fee fits into in order to record it appropriately on forms. Please note the different eligibility criteria for OHC for T-RAP 1.0 and T-RAP 2.0.

Updated 10/2021- When we're relocating someone with OHC, does that displacement need to be documented? And they have to already have a lease signed correct? A household must have been displaced in order to receive short-term hotel/motel assistance, a specific type of OHC, but not in order to receive assistance with rental fees or a deposit for a new unit. If assisting a household with a short term hotel/motel stay, the displacement should be documented in the household's file. A household does not need a signed lease to receive relocation assistance but their new rental address and rental payment amount need to be documented someone. See the Household Information and Eligibility Form for alternatives should a lease not be available.

Updated 10/2021- Can my By and For subgrantee use their By and For budget category on indirect expenses? For T-RAP 1.0, no. For T-RAP 2.0, yes. If the By and For grantee is using this budget category for financial assistance (rent, utilities, other housing expenses), it does not need to be reported on the Monthly Report Form because this category consist of non-Treasury specific funds.

Scenario: Household is moving out of their apartment in the next 30 days and moving into a new apartment. They owe their current landlord 12 months of rent. They want T-RAP to pay their deposit and three months forward rent too.

Updated 10/2021- Can T-RAP only pay for the new apartment and let the balance lie for the current landlord? T-RAP can cover both the arrears at the current place, and the deposit and future rent at the new place. The deposit costs must be processed on the OHC Payment Form and reported under OHC. The rental payment amount and address for both units will need to be documented.

Updated 10/2021- Does T-RAP need to pay the current landlord FIRST? There is no requirement to do this, but an attempt to reduce arrears should be made before, or while also covering the first month's rent and deposit at the new residence.

What can Housing Stability Services cover? Housing stability services include case-management and other services related to the COVID-19 outbreak and intended to help keep

households stably housed. Such services may include case management related to housing stability, housing related services for survivors of domestic abuse or human trafficking, legal services or attorney's fees related to eviction proceedings and maintaining housing stability, and specialized services for individuals with disabilities or seniors that supports their ability to access or maintain housing.

Would utility customers that received energy assistance from LIHEAP and LIHEAP CARES qualify for additional benefits from this program?

Yes, people who have received previous utility assistance from any program are eligible to receive assistance for outstanding bills.

In the event a recipient closes their utility account and the funds they received create a credit balance, does that credit get refunded to the customer? Yes, it would be best practice to refund the credit balance to the household.

Can we assist with the cost of damages? Yes, if damages are incurred during the tenancy and are due immediately then can be covered under Rent.

When should utility charges should be captured on the Utility Payment Form and reported as utility expenses on the Monthly Report Form? When they're not included in the monthly rent payment and the tenant pays the utility company directly.

Without obtaining a release of information from the tenant, can we advise the landlord that the tenant has called and is on the list or not? Getting an ROI to communicate about a tenant is best practice and encouraging the landlord to communicate with their tenant about assistance is good practice. Simple notification about whether their tenant has applied or not or where they're at on the list or queue is acceptable. Refer to agency specific confidentiality policy.

What about late fees? No, RCW 59.18.620(1) prohibits landlords from charging late fees for rent that was due "between March 1, 2020, and six months following the expiration of the eviction moratorium." The "eviction moratorium" that SB 5160 refers to is Proclamation 20-19.6, which expired on June 30, 2021. Six months from that date is December 31, 2021. We encourage you to refer your tenant to civil legal aid or dispute resolution services to discuss any fees or eviction notices tenants may have received under the moratorium. A gentle reminder from the provider to the landlord that these fees aren't allowable might also be helpful.

If the utility bill is split between two months, but the service period is 30 days, does that count as one month or two months of assistance? Example: utility bill is dated 8/15-9/15. Use the service period length to determine the number of months of assistance, in this example of a 30 day service period, this counts as one month.

If using OHC to pay for a short-term hotel/motel stay, do we need to use the FMR as a cap for payment? No, this isn't necessary for hotel/motel stays that are considered OHC.

NEW

Now that late fees are no longer prohibited, can grantees pay them?

Yes, late fees occurring after December 31, 2021 may be paid with T-RAP funds. Late fees fall under the “rent” category, and therefore any amount exceeding 150% FMR may not be paid. Any nonrefundable fee (including late fees) may only be charged if they are included in a written lease, and specified as nonrefundable. Collecting any nonrefundable fees with a verbal agreement only is illegal.

Grantees may choose not to allow late fees based on local factors. Whether or not grantees choose to allow payment of late fees under ERAP 2.0, please note the following legal restrictions:

- Until the end of the public health emergency (pursuant to RCW [59.18.630\(2\)](#)), landlords must offer tenants a reasonable schedule for repayment of unpaid rent before beginning an unlawful detainer action (eviction). Part of the definition of “reasonable” includes covering only rent and not late fees. They also must allow for payments from any source of income (as defined in RCW [59.18.255](#), which explicitly includes emergency rental assistance).
- Landlords may not initiate an unlawful detainer action (eviction) for nonpayment if the tenant does not owe rent, even if they owe other fees or costs on the property (as per [RCW 59.18.283](#)).

Eligibility

Can we assist people in RRH or PSH programs whose subsidy has run out? If the household is still active in a permanent housing program, providers should continue to assist the household until they’ve achieved housing stability. If this is not possible and the household meets the eligibility requirements, they can be served by this program.

Are undocumented residents eligible for T-RAP assistance? United States citizenship is NOT an eligibility requirement of this program.

How will tenant eligibility be determined if payments are allowed directly to the landlord or utility company? Eligibility of the household must be verified before payments can be made, regardless of who initiates the assistance (landlord or tenants).

Can a household receive T-RAP assistance if they have a Housing Choice Voucher, Public Housing, or Project-Based Rental Assistance and their rent is adjusted according to changes in income? An eligible household that occupies a federally subsidized residential or mixed-use property may receive T-RAP assistance, provided that T-RAP funds are not applied to costs that have been or will be reimbursed under any other federal 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.

Can an incarcerated person still receive assistance? Yes, as long as the person meets the eligibility criteria.

Updated 10/2021- Can a household still apply for assistance if they've moved out of the unit but still owe rent to their previous landlord? What about utilities? Yes, T-RAP can cover rent and/or utility arrears from a previous unit. As a condition of receiving payment, landlords and utility providers must agree to not engage in collection efforts regarding the arrears that are paid or related fees or expenses. They must also ensure that any reports to credit agencies will confirm the matter's resolution. Grantees may consider requiring the landlord or utility provider to notify the tenant that payment has been received and that there will be no further collection efforts. Grantees must use the Past Arrears Payment Form for these situations.

Can financial hardship be due to not being able to work because there are children who were home? How can we document that? If they were impacted by COVID and that is the reason they are currently not employed, that could be documented using a self-attestation. If they had always been a stay at home parent and they were not home due to something COVID related (such as they needed to quit their job in order to care for kids that would normally be in school) that would not meet the requirement.

If a client missed some payments while out of work, due to COVID, but now they are over income, can we still serve them based on 2020 income? So long as their 2020 income qualifies under the guidelines, this is allowable.

If a household applies for and receives rental assistance for a given period of time, can they come back and apply for utility assistance for the same period time? Yes, they can get assistance for the utilities if they already got rent assistance for that month. That still just counts as a month of assistance. In other words, if they get June, July and August future rent and then come back to you in September and say they need utility assistance for June, July and August, that still counts as just 3 months of assistance.

Updated 3/2022- Can we pay 15 months as one payment? If not, how long do they have to wait before reapplying for the additional 3 months? More than three months of payment can be made at one time unless a self-declaration is used to document the household's monthly rental payment amount. In this case, payment is limited to three months at one time and eligibility must be re-verified to provide additional payment.

Updated 10/2021- Is there a cap on the Utility reimbursements? There is not a dollar amount cap, there is a cap on the total number of months a household can receive financial assistance though, and that is 15 months for T-RAP 1.0, 18 month for T-RAP 2.0, and 18 months cumulatively.

When a household receives a lump sum unemployment back payment does this count towards their income? Unemployment income needs to be considered for income eligibility.

For income eligibility, do things such as stimulus checks, enhanced unemployment benefits due to COVID-19 or the Expanded Child Tax Credit need to be counted? No, this is temporary, nonrecurring or sporadic income which does not need to be considered for income eligibility.

Can T-RAP cover past utility arrears for a household who's home was foreclosed on and they recently moved into an apartment? No, T-RAP cannot assist with the utilities for a home if the household owned it.

Documentation

Updated 10/2021- Three months of future rent is allowable at a time, do we need to do a recertification every three months to provide additional rent? In order to provide an additional three months of future rent assistance, the household must continue to be experiencing housing stability and have not already received the maximum amount of assistance already. 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.

Can we obtain verbal verification of past due rent from landlord? Rent arrears do not have to be verified, but should be noted on the Rent Payment Agreement Form. Households must attest that all information provided during the application process is true (see last section of the Household Information and Eligibility Form). The landlord must certify that all information provided is true on the Rent Payment Agreement Form.

Updated 10/2021- To determine income eligibility, grantees must consider the household's total income for calendar year 2020, or the household's current monthly income at the time of application. Do we have to have a standard policy/approach to this or can it be individualized by each household? You can determine which to use based on household's income and ability to provide documentation. Please note that if you choose to verify current monthly income at time of application without using a fact-specific proxy, you will need to re-verify the household's income every three months for the duration of assistance, and payments must be limited to 3 months at one time.

How will income eligibility and households with one or more individuals who are unemployed and have been unemployed for 90 days before application date be measured? These criteria will not be measured. Income documentation must be used to determine eligibility. The unemployment prioritization component does not have to be documented. Grantees must document their policies and procedures for determining the prioritization of households in compliance with the statute and maintain records of their determinations. Commerce will review client files and monitor for program compliance.

Where documentation and self-certifications are required, can we use electronic signatures? Yes.

Can agencies keep electronic files rather than hard copies? Yes.

Do leases that automatically go to month to month after the lease end date still count as current? Yes.

Updated 10/2021- The guidelines state the need for a “current” lease, but many landlords are refusing to sign a new lease with tenants that are behind on rent. If the terms have not changed, will this be sufficient to meet the lease requirement? If a lease is not readily available and/or would be an administrative burden to collect, providers can verify rental address and monthly payment amount in other ways. These are listed on the Household Information and Eligibility Form. If the landlord accepts a rent payment for the following month after the original lease ends, the tenant has established a month to month tenancy.

Updated 10/2021- When are verbal verifications allowable in place of actual signatures? The only document asking for a household signature is the Household Information and Eligibility Form. Grantees should work to obtain the household’s signature when possible, and can accept verbal verifications when barriers to doing so arise. Grantees must state in their required Self-Declaration Policy under what circumstances they accept verbal verifications in place of actual signatures.

What is considered a current utility? At what point is a utility payment considered a future payment and not allowed? A utility bill with a current due date that has not yet passed is a current utility bill. For example, the date is April 2nd and the utility bill is due April 15th, this is a current utility bill and payment of this bill is allowable. A future utility payment would be when there is no balance owed yet, and a payment to the utility provider would result in a positive balance on the account. This is not allowable.

Do the rules around verbal verification apply to an email response as well? Yes, this is allowable.

Can we do a verbal signature for the landlord signature on the Payment Agreement Form, or does it have to be signed? While this is at your discretion, it is best practice to gather a signature from the landlord or an email verification. If the landlord provides a verbal verification, you would want to note who you spoke to and on what date in the household’s file. This is due the fact that the landlord is certifying this satisfies the arrears and no additional late charges will be accrued for that debt.

If we have a domestic violence survivor who is currently on the Address Confidentiality Program how can we process their application without putting their physical address on the form? Is it possible to use their ACP address after verifying the address on the lease? Yes, using the ACP address after verifying the rental address via one of the documentation standards is the way to go. You should not retain the actual rental location and only retain the ACP address on any documents/files.

Can a tenant type in their name on the form to count as a signature? Yes, this is allowable.

When they reapply do they have to refill the Household Information and Eligibility Form every time? If 60 days has passed since the household received financial assistance, they need new eligibility paperwork, including the Household Information and Eligibility Form.

Is 2021 HUD's AMI useable for this program or just 2020 HUD AMI? Yes, the most current AMI standards should be used.

Do we need the landlord information and lease if making a payment to a tenant, so that the landlord doesn't also submit an application for the same rent? Agencies should have processes in place to avoid duplication of assistance. Tenant's do need to verify rental address and may do so in a variety ways (See Household Information and Eligibility Form for more information). Rental address can give a way for providers to determine whether assistance has already been provided.

Can the head of household self-declare another adult household member's income? Yes.

Forms

Under the ERAP program, some landlords collected 80% of what was due because their unit was over Fair Market Rent (FMR). Are landlords able to now apply for the difference under the T-RAP program? No, landlords accepted ERAP payments as full satisfaction of any balance owed for the months paid by the program.

When a landlord initiates assistance, would a tenant have to sign an ROI for their landlord to share their info with the provider? No, this is not required. Landlords are responsible to determine their own confidentiality practices.

If the landlord initiates assistance and completes the Rent Payment Agreement Form for their tenant, does this count as the landlord applying for the requirement that the household must sign the Payment Agreement Form? Yes, when a landlord initiates assistance per the instructions on the Payment Agreement Form, the household must sign off on the Payment Agreement Form. Electronic signatures or verbal/electronic verifications are allowable.

If a landlord provides a list of residents with the contacts of a provider, and the provider screens these applicants first – this is not the same as completing the payment agreement form and initiating assistance right? That would require household signature on the Payment form; is that correct? That is correct. The same forms are needed regardless of who initiates the assistance and household signature is required.

Updated 10/2021- Can the Payment Agreement Form serve as a standalone documentation without a copy of the lease? Or is the lease an absolute documentation by Commerce or is it the preferred documentation method, however not a requirement? There are alternative documentation methods to verify rental payment amount and rental location in lieu of a lease and those are outlined on the Household Information and Eligibility Form, the Rent Payment Form is one of them. This can be used if a lease is not readily available, and/or presents an

administrative burden to collect. A Rent Payment Form signed by the landlord can count for documentation of housing status as well.

What Payment Form do we use for relocation expenses that include a security deposit?

Security deposits are considered OHC and should be recorded on the OHC Payment Form and on the monthly report as OHC.

So if a household gets rent, utilities, and internet the provider has to complete 3 forms for each household? If these payments go to three separate entities, yes.

If you put first month and deposit on the OHC Form, where do we get the landlord signature?

There is a place for landlord signature on both forms in the new versions.

How do we calculate FMR for a 5 bedroom unit when HUD FMR only goes up to 4 bedrooms?

FMR's for unit sizes larger than 4 bedroom are calculated by adding 15 percent to the 4 bedroom FMR for each extra bedroom. For example, the FMR for a 5 bedroom unit is 1.15 times the 4 bedroom FMR. The FMR for the 6 bedroom unit is 1.3 times the 4 bedroom FMR and so on.

How is FMR calculated when someone is renting a room? Use the FMR for the number of bedrooms in the unit. Example, if a person is renting one bedroom in a two bedroom unit, split the FMR in half.

Reporting & Performance

Updated 10/2021- Do we need to report all rent and separately stated utility assistance by household? Yes, all types of financial assistance (rent, utilities, and OHC) must be reported by household on the T-RAP Report Form. Utilities included in the lease and paid with rent each month can be reported as Rent. Utilities paid separately to a third party other than the landlord must be reported as Utilities.

Ten percent of households served must be young adults age 18-24. Does this mean the head of household has to be 18-24 or can there be just one in the household? This performance target is based on the head of household's age.

If a community exceeded its racial equity performance measures, will a combination of ERAP and T-RAP funded households be used to determine that these measures are met? ERAP and T-RAP are separate programs and performance measures must be met for each program separately.

We have a current plan for 10% of our overall budget be awarded to a Youth/Young Adult provider. Can we have it be a requirement of 10% of the budget (for rental assistance) instead of percentage of who is served? The performance target measures the percentage of households who are youth or young adults age 18-24. T-RAP Grant Coordinators will measure your performance and communicate about the data on an ongoing basis.

What if the County exceeded the youth and young adult target under the ERAP program? Is there a possibility that a combination of households served under ERAP and TRAP can be calculated? ERAP and T-RAP performance measures must be met separately. It is possible that if a community served a large number of youth and young adults under ERAP, there would be fewer to serve under T-RAP. Grant Coordinators will measure your performance and communicate about the data on an ongoing basis.

We must report on the amount of outstanding rental arrears for each household, can you clarify what this means? This is the amount of arrears the household had *before* T-RAP financial assistance is provided.

Acceptance rate of applications for assistance is a reporting requirement. Can you clarify if this is for households that apply for the program vs community need? This is the number of households that applied for assistance as compared to the number of households that receive assistance. Commerce will calculate this information based on the information you provide in the Report Form.

We must collect the landlord and utility provider's SSSN, tax ID number, or DUNS number 'as applicable'. Can I assume this wouldn't be applicable for landlord or utility provider? Treasury required this information to be collected. We have not received further guidance regarding 'as applicable'. Landlords and utility providers should provide a W-9 form with either their EIN, ITIN or Social Security number unless unavailable. If unavailable, contact your grant coordinator.

If we have a utility assistance program outside of the rental assistance being provided, do we have to be able to link the utility assistance and the rent assistance to each household in the report? If you are providing utility assistance with T-RAP funds, this must be reported on the T-RAP Report Form.

The Report Form asks for the Number of Households Applied. Should we use the number of households who called and received a brief screening to get on the waitlist, or do the households need to have completed the Household Information & Eligibility Form? Use the number of households who contacted your organization seeking assistance and received at least a brief screening.

Are the report forms still ALSO due with reimbursement requests? Or just each month by the 7th? Report Forms are due on the 7th of the month following the month of service. Example, September Report Forms are due on October 7th. Report Forms DO NOT need to come at the same time as your invoice. They should be emailed to your grant manager/coordinator. You have until the 20th of the month to invoice Commerce. Invoices are still submitted through CMS/SAW.

With the contract extension to 2022, do we still need to meet the 65% spent by Sept 2021 target? So will there be additional budget if 65% needs to be spent by Sept 2021 but the program runs to 2022? At this time, Treasury has not removed the 65% spend down requirement that is laid out in statute so Commerce will not be removing that from your

contract. Additional funds will not be added to your current contract. Rather, we will be issuing new contracts for T-RAP 2.0

Will pulling out indirect be retroactive or just moving forward once we have amendment?

Indirect expenses can be recouped back to March 1, 2021. The change applies to the entire contract period. Please note, this does not apply to the By and For budget category since this is comprised of CARES Act funds, not Treasury funds.

We have our providers reporting separately when they invoice us, would that be enough for state reporting or do we need to also do the forms? Please consolidate the information into one Monthly Report Form. Contact your grant manager if this is too administratively burdensome.

Updated 10/2021- Is it accurate that anything paid to the landlord goes under rent and doesn't need to be broken down or reported separately? No. OHC paid to the landlord would still need to be reported separately and the OHC Payment Form must be used. Utilities paid to the landlord are counted as rent.

Other

What is expected of the lead grantee in terms of monitoring for compliance? Lead grantees are responsible for meeting the grant requirements established by the US Department of the Treasury and the Department of Commerce, and are expected to determine their own internal monitoring practices to ensure compliance. Commerce will conduct client file reviews of T-RAP financial assistance providers.

What constitutes an acceptable Policy and Procedure for termination, denial, and grievance? The Termination and Denial 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.

Grievance procedures must clearly describe how households can request a review or report concerns and it must be accessible to all households seeking or receiving services.

Is this separate from ERAP or combined 12 months from ERAP and T-RAP? ERAP and T-RAP are separate programs and the months covered by ERAP do not need to be combined with the months covered by T-RAP.

If the landlord can initiate by submitting forms to grantee and verifying arrears, what if our normal procedure works backwards and reaches out to tenant first? If a landlord initiates the assistance, a grantee would then reach out to the tenant. Because this assistance allows for the landlord to initiate the assistance, grantee process and procedures should accommodate either landlords or tenants being the initiator of the assistance.

Could you use CDBG housing assistance to supplement the 15 month need? You can provide a household in need with additional assistance from a separate fund source, so long as the

assistance is not duplicative. Please note that between T-RAP 1.0 and T-RAP 2.0 cumulatively, the maximum amount of assistance is 18 months.

Can we provide advanced payments to our sub grantees? This is up to each lead grantee. Commerce know allows lead grantees to request advance payments.

NEW

What if a staff member has a relative applying for T-RAP, or they find that they are reviewing an application of a relative or family member?

If there is a staff member that can help the tenant and/or who can process the paperwork that is not related to the tenant, grantees should go that route. If that's not possible, grantees should have a staff member who's not related to the tenant review the paperwork for eligibility. If none of that is possible, grantees should partner with a lead grantee to review the paperwork for your organization. Grantees could also consider getting a release of information with another local organization administering the same funds and pass off the tenant application to them for processing. Please gain consent from the tenant before sharing information.

T-RAP 2.0

Do we need to track these separately due to the different program requirements? Correct. Separate Report Forms must be submitted for each program.

If 2.0 is a separate contract, should we still expect an amendment in a month or so? Yes, we will be amending T-RAP 1.0 contracts in the Fall of 2021.