

CRF Training #5: CRF Reporting and FAQ Clarification

Q. Can we help applicants that are collecting unemployment; however, the applicant lost his/her job in February, before the pandemic started? The only hardship she mentions is the loss of employment back on February 15, 2020. Per her handwriting, she was laid off due to not enough work due to COVID 19.

A. They would still need to have a hardship related to COVID.

Q. If the funds are used to pay for a renter's utility costs, would the renter receive a 1099 or the owner of the house?

A. The landlord would receive the 1099.

Q. I thought the previous thinking was that it will take a while for households to restabilize and therefore it was ok to pay a couple months in advance?

A. No, it is okay to pay a few months after they are reemployed as they are still recovering. That is still made on a month to month basis. This is different than just paying several months at one time which cannot be done.

Q. So if income has not changed it is not necessary to complete a new disaster cert and RIC, correct?

A. Correct.

Q. Do we have to provide a Public Notice for the CRF report like we do with the SHIP annual report?

A. No

Q. How about the insurance portion part of the escrow money in the mortgage, can we pay it if the mortgage is delinquent?

A. yes, only property taxes are restricted.

Q. Is pre-counseling required for those who participate/request Mortgage assistance?

A. No, but it could be a benefit to some as they try to recover financially.

Q. Do we need a 3-day notice/late notice from a landlord for each month of past due rent we pay?

A. The rent does not have to be past due, but it has to be due before you pay it.

Q. Our process will be almost exclusively electronic. Can one self-certification form for the household be acceptable, as long as every adult household member signs?

A. As long as each adult household member can provide information related to income, assets and the hardship and sign it, it would be acceptable.

Q. When is the cutoff date for data due to be reported on Sept. 25? The annual report usually closes out on June 30. Is that the same date?

A. Include data right up to the time you submit.

Q. Are there maximum rents for CRF?

A. No.

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Q. If an applicant submits a utility bill and it is for the correct address but person whose name is on the bill does not live in the household. Can we pay this electric bill?

A. As long as you confirm that the eligible applicant is residing in the unit that you are assisting, this would be eligible.

Q. We had an applicant hand in a lease that has a start date of 4/1/2018 but then end date of the lease says "opened ended" can we pay the rent?

A. If it is still in effect yes, but you should call the landlord to verify each month.

Q. How much can a person asking for assistance have in their checking or saving account before helping them?

A. That is a local decision. The only limitation for these funds is that you cannot serve applicants over 120% AMI under the 24 CFR part 5 income calculation standards.

Q. Can we pay cable, phone and/or internet with future payments? Because a cable bill is usually about \$50 per month; thus, can we pay for Sept, Oct & Nov for a total of \$150.

A. No, you cannot make advance payments.

Q. Can you ensure that there is a "Utility" only strategy. Because of the quick turnaround for trying to spend this money, we are only planning utility payments.

A. The purpose of the CRF fund is to prevent eviction and foreclosure due to COVID-19. Using the funds for utilities should be done in combination with rent and mortgage assistance to prevent a loss of services.

Q. When you state that we need copies of checks for CRF assistance provided do you mean that we need a copy of the checks in the file or will our Finance Departments copies that they keep for their records suffice?

A. You must be able to provide proof of payment during a monitoring visit. Where and how you retain the records is a local decision.

Q. If we are approving the application but the check will not be received by the landlord until after the first, can we have the check sent out early

A. Please cut the check no earlier than the first of the month (or the date rent is actually due)

Q. We have a client who we are assisting for August and would like to help through December. I saw earlier we could help in advance, but my question was answered differently. Please Clarify.

A. You can help through December, but need to pay month to month. Not all at once.

Q. What about assuring for non-duplication of benefits?

A. The duplication of benefit agreement addresses future duplication of benefits and repayment if this occurs.

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Q. Could you clarify the advertising requirements for CRF? Does it have to be advertised for ten days before even taking applications or can applications be accepted during the ten days of advertising? I am basically asking if the start date of the application cycle should be after the ten days of advertising. If applications are received during the advertising period but no one is assisted until after the cycle is over, is that acceptable?

A. You should advertise ten days before accepting so that it is fair to all citizens. The issue is if you find those who came in before the advertising is complete and then don't fund someone that applies after the notice, you may have an issue of looking like it was not done fairly.

Q. Can we accept a letter from the landlord without an actual rent amount?

A. No, you need the actual rent to determine the assistance that will be provided.

Q. Can we pay for utilities for a tenant, when the bill is under the landlord's name instead of the applicant?

A. No.

Q. Can we help applicants that are collecting unemployment; however, the applicant lost his/her job in February, before the pandemic started?

A. They would still need to have a hardship related to COVID.

Q. What happens if the max award is accidentally over paid?

A. CRF does not have a maximum award. This is a local decision. If you set a maximum award, you would need to increase it to comply with your local policy. This could be an issue when you get monitored.

Q. If a client has no past due rent, but knows they will be unable to pay September rent, are they eligible or do they have to be past due?

A. They are eligible as long as a COVID related hardship exists.

Q. So your slide that says, "Still work to spend the first payment fully by October 1st". Are you referring to the 1st allocation from the state to the local government?

A. Yes.

Q. Can you just wait until the mortgage is at least 30 days past due and pay taxes?

A. If it is considered in default and in jeopardy of foreclosure.

Q. What if you pay everything but taxes in Sept. and the household is still in need of assistance in Oct. and they have not paid the past due taxes for Sept. Can the LG pay Sept. taxes in October?

A. No, taxes can only be paid for past due accounts.

Q. Are we allowed to pay utilities if we are not paying rent or mortgage? I thought the purpose of the assistance was to prevent foreclosure.

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A. You are correct. We encourage utilities to be paid as part of eviction prevention or foreclosure prevention.

Q. As the new guidance states that we reach out to clients to confirm their eligibility prior to paying a future month, can we do the same for payments of utilities after the initial payment?

A. Yes.

Q. Can we pay utility deposits with move in assistance?

A. Yes. See the Subrecipient Agreement for eligible uses.

Q. Move-in assistance for a homeless family can be provided using CRF without a COVID related loss, correct?

A. Yes.

Q. Does the check date for Security Deposit need to be after the move in date?

A. The move-in date should suffice.

Q. if we go back on the second month and verify nothing has changed and pay the second month of bills, do we have to do another RIC?

A. A new RIC is required when the household income changes.

Q. Can you provide any guidance on what process to follow if an applicant who has been denied for assistance wants to appeal that decision?

A. Use the same appeals process in place for a SHIP applicant who is denied assistance.

Q. Can you pay for past due rent for a client who no longer lives at that location?

A. No.

Q. If there is a change in income, do we only need to collect a new self-certification?

A. Yes and an updated the RIC to ensure the household is still eligible.

Q. If an applicant is receiving DEO Disaster Unemployment Assistance, DUA - can we provide CRF assistance by reducing the monthly rent/mortgage due less the DUA payments?

A. The unemployment would be considered part of the income. So, if they are still eligible income with the unemployment then they are eligible.

Q. Is it ok if we do not set a max award amount?

A. Yes, this is not required.

Q. Are "Special Needs", "Non-Special Needs Demographics", and "Essential Svcs Personnel" columns optional in the upload spreadsheet?

A. FHFC would like the information filled out even though there are no set-aside requirements to be able to report to the Governor.

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Q. Can sub-recipients charge project delivery fee? I thought only contractors or vendors can charge project delivery fee.

A. They should be paid from admin first.

Q. If a FHFC assisted development received CARES funds, are we able to assist their tenants with additional CARES rental funds? Is this a duplication of benefits?

A. You cannot pay for the same item. if they get partial rent from one source and partial from another, that would be ok. Not sure this is the best use of time/funds. You will need to be in touch with the owners/managers of those properties to make sure there is no DOB.