




City of Phoenix

**CORONAVIRUS RELIEF FUNDED PROGRAMS
POLICY AND PROCEDURES**



Family Services Centers

CITY OF PHOENIX | HUMAN SERVICES DEPARTMENT

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|  <p>City of Phoenix Human Services Department</p> | Policy and Procedures |
| | Subject: Coronavirus Relief Funded Programs |
| | Effective Date: March 2022 Revision Date: March 4, 2022 |

Purpose: The purpose of these procedures is to provide eligibility criteria for the use of several Coronavirus Relief funds.

Background: Through the Consolidated Appropriations Act of 2021, the United States Department of Treasury allocated \$25 billion toward state and local governments to assist households with emergency rent and utility assistance in December 2020. The State of Arizona was appropriated approximately \$464 million, and in January 2021 the City of Phoenix received a \$51.1 million allotment to be used for direct financial assistance necessary to keep families housed and prevent evictions as a result of the COVID-19 pandemic. The Emergency Rental Assistance (ERA 1.0) Program began accepting applications effective March 8, 2021.

ERA 2.0 Program: In May 2021, the City was allocated an additional \$55.3 million in ERA 2.0 funding under the American Rescue Plan Act of 2021 (ARPA) to continue the national emergency rental assistance program.

ARPA Program: In June 2021, the Phoenix City Council approved the City’s ARPA Strategic Plan which included \$4 million to provide additional rental and utility assistance to Phoenix residents that do not meet the income qualifications for ERA assistance.

Eligibility: Eligibility for these programs is based on the household income, COVID-19 and financial hardship impacts.

Requirement: All staff will adhere to these procedures regarding the use of Coronavirus Relief funds.

EMERGENCY RENTAL ASSISTANCE (ERA) 1.0

I. INTRODUCTION

In December 2020, the United States Department of Treasury enacted a \$25 billion Emergency Rental Assistance (ERA) Program under the Consolidated Appropriations Act of 2021. The ERA Program 1.0 is intended to assist renter households impacted by the COVID-19 pandemic with paying up to 15 months of rent and 15 months of utility payments. In January 2021, the City of Phoenix was awarded \$51.1 million and assigned it to the Human Services Department (HSD) for distribution. The HSD retained \$26.1 million to administer through the Family Services Centers infrastructure, utilizing the existing Client Management Services (CMS) database and Central Intake phone line to accept applications from Phoenix residents.

The remaining \$25 million was contracted to a local non-profit Wildfire, who subcontracted with eleven local community-based organizations throughout Phoenix. Assistance will be provided for rental and utility costs incurred from March 2020 through September 30, 2022.

II. APPLICATION PROCESS

Tenant applicants can be submitted by any household member(s) authorized to apply for the ERA Program on behalf of the primary household renter. The primary client must reside in the home and be responsible to provide all required documentation for every household member.

Landlords are allowed to request ERA Program assistance on behalf of a consenting tenant and submit documentation to determine the tenant's eligibility for the program. Landlords are required to provide the following:

- Client application with the client's signature
- All required eligibility documentation
- W-9 with a current tax identification number, current phone number and mailing address
- Signed Landlord Verification Form (attachment A)

Renters and/or Landlords may request an ERA Program appointment through the Human Services Department Central Intake Line at (602) 534-AIDE (2433) on Mondays, beginning at 7:00 a.m. Appointments are scheduled on a weekly basis.

An on-line application portal is also available at phoenix.gov/rentassistapply.

III. PROGRAM ELIGIBILITY

An eligible household member is defined as a renter household and must meet the following eligibility requirements to receive assistance for rent and/or utility costs incurred after March 13, 2020:

- Monthly household income must be at or below 80% of the Area Median Income (AMI) for 30 days prior to the date of the application.
 - IRS 1040's and W2s are acceptable verification of annual income to determine the monthly household income. Total annual income is divided by 12 to determine the countable monthly income.
 - If the previous qualification for assistance was based on monthly income or a written attestation from the client, then a re-determination of household income will be necessary.
 - Written attestation from a client is acceptable if the client is unable to provide documentation at initial request or it is not readily available.
- A. Documentation of unemployment benefits, reduction in household income or other financial hardship due to COVID-19 is required and can be supported by one or more of the following:
- a. Written statement attesting to a COVID-19 impact
 - b. Documentation of confirmed financial impact or collateral contact. Client attestation is permitted if income is not verified due to COVID-19, cash income cannot be verified through bank statement or other means, or if the household does not have qualifying income and due diligence attempts have been made.

Acceptable COVID-19 impacts may include the following:

Reasons

- Termination of employment
- Unemployment insurance benefits
- Reduction of hours or wages
- Business closure
- Child or adult daycare expenses due to facility closures
- Unexpected increase in medical costs due to COVID-19, etc.

Documentation

- Letter from employer
- Proof of UI benefits application approval
- Paystubs
- Child or adult daycare statement/invoice
- Self-certification, if self-employed, etc.
- Written attestation is acceptable if the client is unable to provide documentation at initial request or it is not readily available.

- B. Demonstration of at risk of homelessness or housing instability may include one or more of the following (self-certification identifying risk factor(s) is acceptable if other documentation is not readily available):
- a. One or more household members currently unemployed
 - b. Past due rent notice, eviction notice or utility bill
 - c. Eviction notice or judgement
 - d. Writ of Restitution
 - e. Notice of utility shut off or validation of less than seven (7) days of electricity remaining on pre-paid account (SRP Empower)

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- C. Unsafe or unhealthy living condition or any other evidence of such risks. Assistance is limited to 15 months per household within the lifetime of the grant and is provided in one of the following methods:
- a. Up to 12 months of rental arrears
 - b. Three months of forward rent, only if necessary, to ensure housing stability and subject to availability of funds
- Housing Instability Definition (self-certification identifying risk factor(s) is acceptable if other documentation is not readily available)
- Household member is receiving Unemployment Insurance Benefits (UIB)
 - Household member is unemployed or has reduced hours
 - Household member is currently experiencing COVID-19 related medical issues
 - Household (HH) is below 50% AMI and monthly rent is more than 30% of income (Ex. monthly income is \$1,000, 30% of monthly income is \$300, client's monthly rent is \$600)
- c. Re-determination of household income must be made after each period of three months
 - d. Forward rent cannot be paid unless assistance has first been provided to reduce an eligible household's rental arrears or the rent is current.
- D. Citizenship verification (House bill) is not required
- E. Applicant must be a City of Phoenix resident or pay city of Phoenix water services
- F. Verification of household composition and identity for all household members is required and includes one or more of the following:
- a. Date of Birth
 - b. Social Security number (if available)
 - c. Paychecks stubs with identifying information
 - d. DES Award letter of Client Assigned Profile (CAP) 1 & 2 listing household identifying information
 - e. Immunization records listing date of birth
 - f. Lease Agreement with HH members identifying information listed such as date of birth and/or if available, social security number
 - g. Consular ID
 - h. Work or school ID
 - i. Birth certificates, birth records
 - j. Social security cards, if available
 - k. I-94
 - l. Verification of expected due date from a medical provider or DES CAP2 for household members in their third trimester of pregnancy.
 - m. Any legal document with identifying information.
- G. Rental and utility assistance provided cannot duplicate other federally funded assistance (LIHEAP, CSBG, ESG, CARES Act) for the same time frame. Diligence to prevent duplication of services may include:
- a. Client attestation of prior assistance
 - b. Cross checking with other agency databases

IV. ALTERNATIVE INCOME ELIGIBILITY SOURCES

A renter's household low-income status may be verified through Categorical Eligibility or an approved Fact-Based Income Proxy data source in lieu of direct income document verification.

- A. Categorical Eligibility – A determination letter in correlation with another local, state, or federal agency serves as verification of low-income status. If a government agency previously substantiated a household's low-income status, their determination letter can be used for assessment, provided the letter is current at the time of application.
 - a. Categorical Programs – Household members eligible for the following government programs shall be categorically income eligible for ERA funding:
 - i. Supplemental Nutrition Assistance Program (SNAP)
 - ii. Temporary Assistance for Needy Families (TANF)
 - iii. Cash Assistance
 - iv. Public Housing
 - v. Housing Choice Voucher Program.
 - b. Documentation of Categorical Eligibility is required and can be identified by the following:
 - i. Decision letter for the program demonstrating current eligibility
 - ii. Copy of AZTECS CAP2 Household Summary (for SNAP and TANF only)
 - iii. Letter from the administrating agency verifying current eligibility for the program.
- B. Fact-Based Income Proxy – Reliance on public data regarding average incomes in the household's geographic area, called a census block group.
 - a. Eligible Census Block Group criteria – If 60% or more of the population in a specific census block is at or below 80% of AMI at the time of the application, the household is considered income eligible.

Note: Income verification is not required if the household is deemed categorically eligible. Staff will upload program verification and tag accordingly. Verification of financial impact caused by the COVID-19 pandemic is still required.

V. TYPES OF SERVICES

To qualify for rental or utility assistance, the household must demonstrate an obligation to pay rent or utilities by providing a current lease agreement, written statement from the landlord/property manager or a utility bill for current rental unit. Assistance may still be provided if a tenant has vacated the unit, with the tenant's agreement, and landlord's confirmation that no further collection efforts will be pursued against the tenant.

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Rental (Housing) Assistance – Applicants may receive a total combination of 15 months of assistance, including past due, current, and forward rent, late fees and court fees associated with eviction proceedings. Applicants are eligible to receive move-in deposits and other assistance related to securing housing. Additional rental payments required by a landlord to enter a lease with a “hard-to-house” household may be included in the move-in costs. The additional payment must be documented and cannot exceed one month’s rent.

Applicants are eligible to receive up to 12 months of rent including arrears, if applicable, and only three (3) month increments of forward rent. Re-determination is required for each additional three months of forward rental payments unless an applicant previously qualified based on the household total income for the calendar year. The following scenarios depict how the 15 months of total assistance can be applied.

Example Scenarios:

1. If a household member is 12 months past due and is unemployed (housing instability), they are eligible for assistance for the entire 12 months of arrears and 3 months of forward in rental assistance. This client will have reached the 15-month limit and is not be eligible for future ERA 1.0 funded assistance.
2. If a household member is current with their monthly rental obligation but meets the “needs housing stability” eligibility criteria, they may be assisted with three months of rent. The household member may still be eligible for an additional 12 months of assistance but must reapply for future assistance as a new certification is required for every three months of forward rent.
3. If a household member is 6 months past due and has a housing stability need, they may qualify for six months of arrears and three months forward, totaling in nine (9) months of rental assistance. They may reapply for an additional forward rent of six months with required recertification for the three-month increments.

Utility Bill Assistance Payments – Applicants may receive assistance up to 15 months of utility and home energy costs. Assistance is allowed for all past due and current utility bill charges for electric, gas and water services including deposits. Permissible utility vendors include City of Phoenix Water Services, Arizona Public Service, Salt River Project, and Southwest Gas.

Utility bill credits are calculated by using 150% of the cost of electricity for the current month and multiplying by three (3). Example: $\$175 \times 150\% = \$262.50 \times 3 = \$787.50$. The amount can be rounded up or down to the nearest dollar.

CMS Rent Service Types:

- Rent Payment
- Rent Deposit
- Move-in Expenses
- Rent Payment-Eviction Prevention
- Utilities Included in Rent

CMS Utility Service Types:

- Utility Payment
- Utility Deposit

VI. PRIORITY SERVICES

Priority will be given to households at or below 50% AMI, or to those who have been unemployed for 90-days. To satisfy this prioritization requirement the following measure will be implemented:

- A. All Family Services Center Casework staff have access to provide services with ERA funds through any appointment type and will determine if one of the two stipulated priority criteria is met.
- B. Applicants through the Central Intake Line will be screened and asked the following question to determine if they meet the priority criteria.
 - a. What is your total monthly income?
 - i. If the applicant falls at or below 50% AMI, they will be provided with an appointment within the week.
 - b. Have you recently lost employment?
 - i. If yes, how long have you been unemployed? If more than 90 days, the applicant will be provided with an appointment within the week.
- C. As weekly appointments meet scheduling capacity, applicants who are identified meeting the stipulated priority criteria will be provided an appointment.

VII. ADDITIONAL REQUIREMENTS

A landlord or property manager may apply for rental assistance on behalf of a consenting tenant.

- A. The landlord or property manager must request an appointment through the Central Intake Line.
 - Note: Assistance on behalf of each renter will require a separate appointment.
- B. The landlord or property manager must obtain the signature of the tenant on the application and submit all required documentation to determine the tenant's eligibility for the program. All eligibility criteria will remain the same.
- C. The landlord or property manager must apply all received payment assistance to satisfy the tenant's rental obligations.
- D. The landlord or property owner must complete and submit the Landlord Verification Form, which must be signed by both the landlord and the tenant. (Form will be emailed to landlord at prescreening).

VIII. RENTAL ASSISTANCE PAYMENTS TO TENANTS

Rental payments may be issued directly to a tenant if a landlord or property manager is unwilling to accept rental assistance from the City or is unable or unwilling to complete and submit a W-9 form.

- A. The landlord or property manager must provide a verbal or written statement refusing ERA funded rental payments on behalf of the tenant or indicate they are unable or unwilling to submit a completed W-9 Form.
- B. The tenant must sign the Tenant Agreement Form in which they affirm the funds received will be used to pay the household's rental obligation, and not used for any other purpose.

IX. SINGLE SERVING AGENCY

When an applicant receives assistance at one agency, they should be encouraged to reapply with the same agency they received initial assistance from, if possible, in order to accurately track the total number of months assisted.

Lease Verification – Applications must contain a current lease agreement, signed by the applicant and the landlord. If a household does not have a signed lease, documentation of residency can be verified by one of the following:

- Landlord statement who can be identified as the verified owner, or management agent of the unit. (must include address and monthly rental payment amount)
- Move-in agreement upon approval of unit
- Ledger or Check-in statement from short term stay lease
- Other reasonable documentation which establishes a pattern of payment and can be verified by the owner.

Sublease – When an applicant is applying for assistance through a sublease, staff must verify ownership of the property, confirm the owner, and determine legitimacy of the sublease with the owner. This may include a copy of both the originating lease between the owner to the sublessor and the sublease between the sublessor to the subtenant (applicant). Payment should be made directly to the owner unless otherwise stated on the lease or with the owner's written consent to a different payee. If the applicant is unable to produce verification of a sublease agreement, the household can apply directly through the primary lease if the lease holder is part of the household. Payment would be made directly to the owner.

X. REQUIRED FILE DOCUMENTATION

Case files must contain the following listed documents, and electronic records are sufficient.

- A. Client Application Includes:
 - a. Release of Information
 - b. Affidavit of Identity
 - c. Client Complaint Procedure Acknowledgment

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- B. Proof of identity for applicant and all household members
- C. Proof of income for all household members
- D. Current lease agreement (for rental assistance) or proof of address if no rental assistance provided
- E. Utility bills if utility assistance is provided (ERA Utility Verification Form)
 - a. Services for Today Summary
- F. Hardship Verification (COVID-19 and Financial Impact)
- G. Collateral Verification form (if applicable)
- H. 5-day notice, Late Notice, Ledger, or Collateral Contact to confirm arrears balance and total months owed
- I. Landlord Collateral Verification Form (if rental assistance provided)
- J. Landlord Verification Form, if landlord is applying on behalf of tenant
- K. W-9 Form for approved SAP vendor
- L. Documentation of Wildfire Prefix database duplication check

XI. FRAUD PREVENTION

The City of Phoenix is required to administer the ERA Program in accordance with established policies designed to be flexibly achievable while ensuring appropriate controls to prevent fraud or abuse of the program. In doing so, City staff are authorized to request additional documentation from the applicant if inconsistent or conflicting information is received while determining program eligibility.

The ERA Program application includes a signed statement from the applicant affirming the following statement: I certify the information provided is a true and accurate statement of my living circumstances. I authorize the City of Phoenix to verify the information provided by me to determine eligibility for assistance.

EMERGENCY RENTAL ASSISTANCE (ERA) 2.0

I. INTRODUCTION

Under the American Rescue Plan Act (ARPA) of 2021, the federal government allocated \$21.5 billion to continue the national emergency rental assistance program (ERA 2.0). The ERA Program 2.0 is intended to assist renter households impacted by the COVID-19 pandemic with paying up to 18 months of rent and 18 months of utility payments. In May 2021, the City was allotted a total of \$55.3 million in ERA 2.0 funding to administer through the Family Services Centers infrastructure, utilizing the existing Client Management Services (CMS) database and Central Intake phone line to accept applications from Phoenix residents. ERA 2.0 funds will be available through September 30, 2025 or until funds are expended.

II. APPLICATION PROCESS

Refer to ERA 1.0 (no change)

III. PROGRAM ELIGIBILITY

Refer to ERA 1.0 for similar eligibility requirements.

Notable ERA 2.0 changes for this section are as follows:

- One or more individuals within the household has qualified for unemployment benefits or experienced a reduction in household income, incurred significant costs, or experienced other financial hardship during or due directly or indirectly to the COVID-19 pandemic.
- A. Documentation of unemployment benefits, reduction in household income or other financial hardship during or due to the COVID-19 pandemic. Financial impact is required and can be supported by one or more of the following:
- a. Written applicant statement attesting to a crisis during the pandemic.
 - b. Documentation of confirmed financial impact or collateral contact. Client attestation is permitted if income is not verified during or due to COVID-19, cash income cannot be verified through bank statement or other means, or if the household does not have qualifying income and due diligence attempts have been made.

Acceptable COVID-19 impacts may include the following:

Reasons

- Termination of employment
- Unemployment insurance benefits
- Reduction of hours or wages
- Business closure
- Child or adult daycare expenses due to facility closures
- Unexpected increase in medical costs incurred during the COVID-19 pandemic, etc.
- Unexpected expenses (not COVID related)

Documentation

- Letter from employer
- Proof of UI benefits application approval
- Paystubs
- Child or adult daycare statement/invoice
- Self-certification, if self-employed, etc.
- Written attestation is acceptable, if the client is unable to provide documentation at initial request or it is not readily available.
- Medical bills and/or related expense receipts

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- B. Refer to ERA 1.0 (no change)
- C. Unsafe or unhealthy living condition or any other evidence of such risks. Assistance is limited to 18 months per household within the lifetime of the grant and is provided in one of the following methods:
 - a. Up to 15 months of rental arrears
 - b. Three months of forward rent, only if necessary, to ensure housing stability and subject to availability of funds

Housing Instability Definition (self-certification identifying risk factor(s) is acceptable if other documentation is not readily available)

- Household member is receiving Unemployment Insurance Benefits (UIB)
 - Household member is unemployed or has reduced hours
 - Household member is currently experiencing medical issues
 - Household member has special medical needs or severe health risks
 - Household is below 50% AMI and monthly rent is more than 30% of income (Ex. monthly income is \$1,000, 30% of monthly income is \$300, client's monthly rent is \$600)
 - Imminent eviction threat – lock-out notice received
- c. Re-determination of household income must be made after each period of three months
 - d. Forward rent cannot be paid unless assistance has first been provided to reduce an eligible household member's rental arrears or the rent is current.

- D. Refer to ERA 1.0 (no change)
- E. Refer to ERA 1.0 (no change)
- F. Refer to ERA 1.0 (no change)
- G. Refer to ERA 1.0 (no change)

IV. **ALTERNATIVE INCOME ELIGIBILITY SOURCES**

Refer to ERA 1.0 (no change)

V. **TYPES OF SERVICES**

To qualify for rental or utility assistance, the household must demonstrate an obligation to pay rent or utilities by providing a current lease agreement, written statement from the landlord/property manager or a utility bill for current rental units. Assistance may still be provided if a tenant has vacated the unit, with the tenant's agreement, and landlord's confirmation that no further collection efforts will be pursued against the tenant.

Coronavirus Relief Funded Programs ERA 2.0 Operating Procedures

Rental (Housing) Assistance – Applicants may receive a total combination of 18 months of assistance, including past due, current, and forward rent, late fees and court fees associated with eviction proceedings. Applicants are eligible to receive move-in deposits and other assistance related to securing housing. Additional rental payments required by a landlord to enter a lease with a “hard-to-house” household may be included in the move-in costs. The additional payment must be documented and cannot exceed one month’s rent.

Applicants are eligible to receive up to 15 months of rent including arrears, if applicable, and only three (3) month increments of forward rent. Re-determination is required for each additional three months of forward rental payments unless an applicant previously qualified based on the household total income for the calendar year. *If a household member received assistance with ERA 1.0 funding, additional months may be considered to align with the 18-month lifetime limit.* The following scenarios depict how the 18 months of total assistance can be applied.

Example Scenarios:

1. If a household member is 15 months past due and is unemployed (housing instability), they are eligible for assistance for the entire 15 months of arrears and 3 months of forward in rental assistance. This applicant will have reached the 18-month limit and will not be eligible for future ERA funded assistance.
2. If a household member is current with their monthly rental obligation but meets the “needs housing stability” eligibility criteria, they may be assisted with three months of rent. The applicant may still be eligible for an additional 15 months of assistance but must reapply for future assistance as a new certification is required for every three months of forward rent.
3. If a household member is 6 months past due and has a housing stability need, they may qualify for six months of arrears and three months forward, totaling in nine (9) months of rental assistance. They may reapply for an additional forward rent of 9 months with required recertification for the three-month increments.
4. *If a household member received 12 months of assistance using ERA 1.0 or ARPA funding, they may be eligible for an additional 6 months using ERA 2.0 funding.*

Utility Bill Assistance Payments – Applicants may receive assistance up to 18 months of utility and home energy costs. Assistance is allowed for all past due and current utility bill charges for electric, gas and water services including deposits. Permissible utility vendors include City of Phoenix Water Services, Arizona Public Service, Salt River Project, and Southwest Gas.

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Utility bill credits are calculated by using 150% of the cost of electricity for the current month and multiplying by three (3). Example: $\$175 \times 150\% = \$262.50 \times 3 = \$787.50$. The amount can be rounded up or down to the nearest dollar.

CMS Rent Service Types:

- Rent Payment
- Rent Deposit
- Move-in Expenses
- Rent Payment-Eviction Prevention
- Utilities Included in Rent

CMS Utility Service Types:

- Utility Payment
- Utility Deposit

VI. PRIORITY SERVICES

Refer to ERA 1.0 (no change)

VII. ADDITIONAL REQUIREMENTS

Refer to ERA 1.0 (no change)

VIII. RENTAL ASSISTANCE PAYMENTS TO TENANTS

Refer to ERA 1.0 (no change)

IX. SINGLE SERVING AGENCY

Refer to ERA 1.0 (no change)

X. REQUIRED FILE DOCUMENTATION

Refer to ERA 1.0 (no change)

XI. FRAUD PREVENTION

Refer to ERA 1.0 (no change)

AMERICAN RESCUE PLAN ACT (ARPA)

I. INTRODUCTION

In March 2021, the United States Department of Treasury enacted a \$350 billion American Rescue Plan Act (ARPA) Program. ARPA Program funding for housing is intended to assist renter households impacted by the COVID-19 pandemic. In June 2021, the Phoenix City Council approved the City's ARPA Strategic Plan which outlined program summaries for the City's Coronavirus State and Local Fiscal Recovery Funds ARPA allocation. On September 7, 2021 Phoenix City Council approved \$4 million to provide additional rental and utility assistance to Phoenix residents with income levels between 80 and 120% of Area Median Income (AMI). The funds will be administered through the Family Services Centers infrastructure, utilizing the existing Client Management Services (CMS) database and Central Intake phone line to accept applications from Phoenix residents. ARPA funds will be available through December 31, 2024 or until expended.

II. APPLICATION PROCESS

Refer to ERA 1.0 (no change)

III. PROGRAM ELIGIBILITY

Refer to ERA 1.0 for similar eligibility requirements.

Notable ARPA differences for this section are as follows:

An eligible household member is defined as a renter household and must meet the following eligibility requirements to receive assistance for rent and/or utility costs incurred after March 13, 2020:

- Monthly household income must be *between 80% and 120%* of the Area Median Income (AMI) for 30 days prior to the date of the application.
- IRS 1040's and W2s are acceptable verification annual income to determine the monthly household income. Total annual income is divided by 12 to determine the countable monthly income.
 - If the previous qualification for assistance was based on monthly income or a written attestation from the client, then a re-determination of household income will be necessary.
- Written attestation from a client is acceptable if the client is unable to provide documentation at initial request or it is not readily available.

A. Refer to ERA 1.0 (no change)

B. Refer to ERA 1.0 (no change)

C. Unsafe or unhealthy living condition or any other evidence of such risks. Assistance is limited to 18 months per household within the lifetime of the grant and is provided in one of the following methods:

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Housing Instability Definition (self-certification identifying risk factor(s) is acceptable if other documentation is not readily available)

- Household member is receiving Unemployment Insurance Benefits (UIB)
- Household member is unemployed or has reduced hours
- Household member is currently experiencing medical issues
- Household member has special medical needs or severe health risks
- Imminent eviction threat – lock-out notice received

D. Refer to ERA 1.0 (no change)

E. Refer to ERA 1.0 (no change)

F. Refer to ERA 1.0 (no change)

H. Refer to ERA 1.0 (no change)

IV. ALTERNATIVE INCOME ELIGIBILITY SOURCES

Refer to ERA 1.0 for similar eligibility requirements.

Notable ARPA difference for this section are as follows:

- Income proxy will not be recognized in ARPA.

V. TYPES OF SERVICES

Refer to ERA 1.0 (no change)

VI. PRIORITY SERVICES

Refer to ERA 1.0 (no change)

VII. ADDITIONAL REQUIREMENTS

Refer to ERA 1.0 (no change)

VIII. RENTAL ASSISTANCE PAYMENTS TO TENANTS

Refer to ERA 1.0 (no change)

IX. SINGLE SERVING AGENCY

Refer to ERA 1.0 (no change)

X. REQUIRED FILE DOCUMENTATION

Refer to ERA 1.0 (no change)

XI. FRAUD PREVENTION

Refer to ERA 1.0 (no change)