



RentHelpMN
COVID-19 Emergency Rental Assistance
Program Guide

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Chapter 1 – Introduction

The following document represents Minnesota Housing Finance Agency’s implementation of the COVID-19 Emergency Rental Assistance Program.

The COVID-19 Emergency Rental Assistance Program (Program) provides direct assistance for renter Households that have experienced or are at risk of financial hardship due to the COVID-19 pandemic. The assistance is meant to help prevent homelessness and maintain housing stability. The Program is funded through the federal Emergency Rental Assistance (ERA) Program enacted in December 2020 under Title V, Subtitle A, Section 501(a) of the Consolidated Appropriations Act, 2020. Minnesota Housing Finance Agency (Minnesota Housing) received an allocation of \$289.4 million in January 2021. This funding is subject to Uniform Grants Guidance 2 C.F.R. Part 200 and all applicable U.S. Department of the Treasury (Treasury) guidance and regulations. The federal assistance number assigned to the Program is 21.023.

The Program may be used for rent, utilities, and home energy costs (both in arrears and prospective for rent, within Program limits, as described in this Program guide). Eligible applicants include renter Households with incomes at or below 80% area median income (AMI) and who have experienced financial hardship through the COVID-19 outbreak and can demonstrate a risk of experiencing homelessness or housing instability. Landlords may initiate an application to the Program with the participation of the tenant. Homeowners are not eligible for this Program.

Minnesota Housing is utilizing a centralized intake and application system for renter Households and landlords to submit online or paper applications to request assistance with rent and/or utilities. Minnesota Housing will facilitate application processing and payment through a centralized processor and will contract with local Field Partners to provide navigational services to renter Households who are most impacted by housing instability, are least likely to apply, or do not have the capacity to complete an online application.

Equity

This Program is intended to benefit people at risk of homelessness or housing instability due to the COVID-19 pandemic. Specific groups are overrepresented among this population, including Black, Indigenous, and People of Color (BIPOC) populations, people with disabilities, veterans, and lesbian, gay, bisexual, transgender, or questioning/queer (LGBTQ) populations. Minnesota Housing will work with a network of Field Partners to help remove barriers to these populations and others least likely to apply or have the capacity to complete an online application. In addition, renter Households who have very low incomes (less than 50% area median income [AMI]) and renter Households with a member experiencing unemployment for 90 plus days at the time of application will be prioritized.

Marketing and Communications

Minnesota Housing is working with marketing and communications vendors to develop a communications and marketing plan with a strong focus on equity and reaching BIPOC Households and other Households least likely to apply or who may experience barriers when applying to the Program.

The marketing and communications team has created the campaign for the COVID-19 Emergency Rental Assistance Program, also referred to as RentHelpMN (<https://www.RentHelpMN.org>), including advertising, marketing materials, and a toolkit of materials for Field Partners.

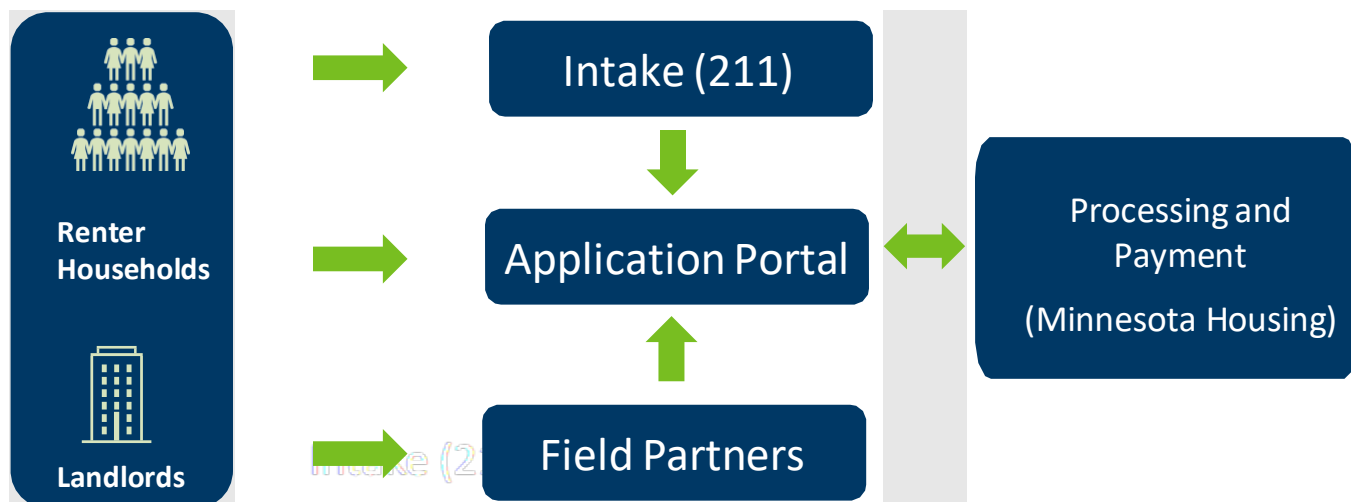
Community Engagement

Since January 2021, Minnesota Housing has engaged stakeholders to inform the design of RentHelpMN. Central to this engagement has been a focus on equity and building a process that will work well for the majority of users and identifying unique strategies to overcome barriers that might disproportionately affect certain communities. Minnesota Housing has met with community-based organizations, landlords, legal services providers, social service providers, and culturally affiliated organizations to capture lessons learned from the COVID-19 Housing Assistance Program and adopt recommendations to the COVID-19 Emergency Rental Assistance Program (RentHelpMN), as warranted. Minnesota Housing worked with the consultant Culture Brokers to facilitate and summarize key themes from two engagement sessions and to host applicant focus groups. Minnesota Housing is continuing regular engagement with stakeholders and the community to share information, answer questions, and trouble-shoot.

Modifications and Scope

This document may be modified or updated periodically by Minnesota Housing as it deems necessary. Additional clarity may also be provided through frequently asked questions or other information provided on the RentHelpMN.org website. This Program is subject to federal requirements; Minnesota Housing has no discretion to modify the federal requirements. This document is specific to Minnesota Housing’s administration of the Program; local government entities and Tribal Nations that received direct allocations of Emergency Rental Assistance from the federal government will operate under their own policies and procedures. This program and all of the parameters of this guide are expressly subject to, and limited by, available federal Emergency Rental Assistance resources.

Chapter 2 – Program Process



General Application Lifecycle

A renter Household (or someone working on behalf of a renter Household, including landlords or Field Partners) will apply to the Program in one of four ways: through a general intake process via the Greater Twin Cities United Way 211 (211), directly to an online application portal, through a navigational Field Partner, or by using a mail in application. Status updates related to applications and payments will be provided through centralized processing and payment mechanisms and will include direct communication with the applicant. Minnesota Housing will facilitate payments.

The deadline to submit a RentHelpMN application is Friday, January 28, 2022 at 9 PM. All applications or re-applications submitted after this time will not be processed and any incomplete application as of that point will be considered withdrawn.

2.1 Centralized Intake and Navigation – 211

Greater Twin Cities United Way 211 (211) provides a public facing intake point for renter Households and landlords seeking assistance on the application process. Intake through 211 occurs across the state via telephone or text.

Intake

Intake access points to determine initial eligibility:

- When a Household contacts 211 via telephone, 211 staff will assess initial eligibility, and if possible, assist through the application process.
- When a Household texts “MNRENT” to 898-211, the Household will receive a text message with a link to the initial eligibility questions and 211’s phone number.
- When a Household accesses the Program webpage at www.RentHelpMN.org and proceeds to start an application.

- 211 will serve as an ongoing contact point for applicants who contact 211 for information related to pending applications.

- Renter Households who need further assistance completing an application or who do not have internet access can request accommodations upon intake. They will be provided information as to how the application can be completed with assistance.
- A renter Household may request a paper application or reasonable accommodations related to a disability through 211.

Navigation

An applicant who re-engages with 211 during the application process will generally be provided with the following navigational services:

- 211 staff will access the Household's application to check the status and determine if the application is complete. 211 staff will also provide application assistance and information regarding documentation needed, etc.
- 211 staff may refer renter Households to the Field Partner network for more intense navigational services upon request from the applicant, or if the applicant needs hands on services to successfully complete the application.

2.2 Common Household Application Portal (RentHelpMN.org)

The Household or someone working with an eligible renter Household (including a Field Partner) will complete the Common Household Application via the online system, accessed through RentHelpMN.org (<https://renthelpmn.org>) or through 211. The system will:

- Allow 211 and Field Partner staff to access applications to assist renter Households with Program prescreening and eligibility determination.
- Allow renter Households to create an account, complete the Program application, upload required documentation, e-sign documents, and check the status of their Program application.
- Allow renter Households to send secure messages to RentHelpMN Administrators (entities administering Program funds within the Common Household Application Portal) using Short Message Service (SMS), telephone, or email.
- Allow renter Households to save their applications and return to complete at a later time.
- Allow RentHelpMN Administrators to receive referrals, view referred Household Program applications, complete Program applications on behalf of renter Households, track and update Program application status, and record and track rental assistance payments made pursuant to the Program.
- Allow RentHelpMN Administrators to view and send secure communications, view all documents uploaded into the system, and generate payment authorization requests.
- Allow RentHelpMN Administrators to create reports via a built-in reporting engine.
- Automatically verify the address of the applicant is a correct address.
- Flag errors in the application for RentHelpMN Administrators to address.

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- Flag duplicate applications so they can be investigated during application processing.
- Allow notifications to be generated when applications are initiated by landlords. The notifications link to the tenant informing the tenant they have rental assistance that they need to approve.
- Allow landlords the ability to log into a dashboard to view and check the status of their renter Household's applications.

Various local jurisdictions that received direct allocations of the COVID-19 Emergency Rental Assistance may also use the Common Household Application system to accept applications, including Minnesota Housing, the counties of Hennepin, Dakota, Ramsey and Washington and the cities of Minneapolis and Saint Paul. Those local jurisdictions will process applications according to their own processes and procedures.

Minnesota Housing is also coordinating with the Minnesota Department of Human Services regarding a subset of applicants who were not able to access the RentHelpMN application process due to the structure of their subsidy (Housing Supports/formerly Group Residential Housing).

2.3 Housing Assistance Application Processing – Witt O'Brien's

Application Phases

- Only Households with demonstrated rental arrears will be invited to apply but all eligible expenses for those Households (including prospective rent and past due and current utilities) may be paid, subject to available resources.

NOTE: The Program also prioritizes households who are very low income or who have been unemployed for 90 or more days; refer to section 3.06 for details.

Application Processing Workflow

A completed application will be processed via a centralized Processing Agent, Witt O'Brien's. The Processing Agent will conduct a complete review of the application, evaluate for eligibility of applicant, validate the requested expenses and payee information, make a payment determination, and facilitate streamlined payment processing with development of a payment file for bank processing.

The Processing Agent will provide case management services for applications in a pending status ("pending application"). A pending application is an application that has been submitted and has not been denied, withdrawn or paid. An "incomplete" status is not a pending status. An application is not considered denied and remains pending until 15 days after the date of the notice of denial, in any situation where the applicant has the ability to appeal, to allow applicants an opportunity to appeal. If no appeal is submitted, the denial is final and the application is no longer pending. If an appeal is timely submitted, an application is considered pending until a final determination is made on the appeal.

For pending applications, the Processing Agent will reach out to applicants or refer an applicant back to 211 or the Field Partner if more hands-on services are required for a Household to successfully finish an application for processing

Mailed in applications mailed by the deadline that include sufficient information will be processed . Sufficient information includes contact information for the renter Household, all necessary signatures, and hardship and housing instability certifications. Mailed applications that provide the information above will be considered pending but any required information must be provided after three attempts to contact in 14 days.

If the payment is deemed eligible, the Processing Agent will submit to Minnesota Housing to make the payment and update the status of the application as paid in the application system.

If the payment is deemed ineligible, the Processing Agent will update the status of the application system and include a written denial notice with the reason(s) for denial that will be sent to the renter Household.

2.4 Field Partners

Minnesota Housing is contracting with a network of nonprofit and community Field Partners to provide culturally appropriate outreach and navigational services to renter Households who are least likely to apply and most likely to encounter barriers with the application system process.

Outreach

Field Partners will conduct outreach to renter Households least likely to apply for the Program, directing applicants to 211 to get started. Outreach activities completed by Field Partners include:

- Create Program awareness/market the Program
- Provide multiple communication options to engage and communicate with applicants, including text, telephone, email, mail, and in person, as needed
- Communicate with other Program partners such as other marketing partners, call center partners, and/or central application processing partners

Navigational Services

Field Partners offer one-on-one navigational assistance to clients who need help to successfully complete an application to the Program. These services will be available by appointment and at no cost to the applicant. Navigational services provided by Field Partners include:

- Provide staff support for renter Households to prepare and submit an application
- Provide culturally specific assistance, as appropriate
- Provide a language plan, including translation services

2.5 Appeals and Re-Application Policy

Re-Application Policy

If an application for assistance reaches a final status of payment sent, denied, or withdrawn

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the tenant may re-apply for additional assistance including any past due rent or utilities in a prior application that were not paid. Re-application is not available once a household has reached the 18-month limit on assistance. Applicants who have been denied may re-apply 2 times in a period of 90 days and continue to be denied before being placed in a paused status where they are not eligible to re-apply.

Appeals Policy

If an applicant is deemed ineligible, a written denial letter will be sent to the applicant listing the reasons for denial via email or the U.S. Postal Service if no email is available. The applicant may appeal the denial decision by contacting the Processing Agent and requesting an appeal of the decision, in the manner set out in appeal instructions on the Program website, within 10 days of the date of the denial letter. If an applicant has a portion of their overall assistance request denied, the applicant may appeal the reduction of assistance by contacting the Processing Agent and requesting an appeal of the decision in the manner set out in appeal instructions on the Program website within 10 days of the date of the payment letter.

If the applicant wishes to have any additional information considered as part of the appeal, that information must be submitted with the appeal request; otherwise the review of the appeal will consist of a review of the materials and information previously submitted with the application.

Pending applications that require additional information are deemed withdrawn, with no right to appeal, if no response is received by the applicant after three attempts to contact in 14 days.

After receiving a request for an appeal, the Processing Agent will assign a staff person to review the materials submitted by the applicant, if any, to determine if the applicant was eligible for Assistance at the time of application. During the appeals process, the application is considered “pending”. If, on review the applicant is deemed eligible, they will be assisted based on the time and date of the original application submission. If the applicant is again deemed ineligible, a written letter of the final appeal decision will be sent via email or U.S. Postal Service to the applicant with the decision and the reasons for upholding the denial.

If an applicant is successful in their appeal, their ability to receive assistance will depend on whether sufficient COVID-19 Emergency Rental Assistance funds are available on the date of the appeal decision. A successful appeal decision does not guarantee receipt of assistance.

2.6 Language Access and Reasonable Accommodation Policy

Application and marketing, electronic interface and print materials will be translated into English, Spanish, Somali, Hmong, and in some cases, Karen, and Oromo. Navigational and intake services are also available for these languages. Applicants needing additional language assistance can request accommodations by calling 211.

Applicants can make other reasonable accommodations requests by calling 211.

2.7 Coordination with Local Program Administrators

Six local jurisdictions including the counties of Dakota, Hennepin, Ramsey, and Washington and the cities of Minneapolis and Saint Paul received direct allocations from the federal government of ERA funds. Minnesota Housing’s Program will run statewide in partnership with local jurisdictions. Local jurisdictions may accept applications using RentHelpMN and will process those applications using their own processes and procedures. Local jurisdictions using the RentHelpMN system will have data sharing and other agreements to facilitate the routing of applications to the Minnesota Housing and local programs.

If Minnesota Housing has knowledge that a unique household has an application in process with another federal ERA-funded program, the Minnesota Housing application will be placed on pause. The applicant can call 211 to request that their application be placed back in an active status but Minnesota Housing must determine the amount of assistance received and if the household is eligible for further assistance.

In addition, nine Tribal Nations in Minnesota received separate direct allocations and are running separate programs.

Chapter 3 – Household Eligibility

3.1 Eligible Renter Households

To qualify for this Program, renter Households must meet all criteria listed below:

Households (must meet all of the following)	Eligibility Criteria
1. Be a low-income renter in Minnesota	<p>Renter Households must be at or below of 80% AMI for their location (metro area or non- metro county), as set by the most current U.S. Department of Housing and Urban Development Income Limits). Renter Households at or below 50% AMI are prioritized as described below.</p> <p>Household income will be verified to establish eligibility in Minnesota; exceptions apply.</p>
2. Have qualified for unemployment benefits or experienced financial hardship directly or indirectly due to the coronavirus outbreak	<p>A Household may demonstrate financial hardship through a written attestation which includes qualification for unemployment benefits or other financial hardship.</p>
3. Can demonstrate a risk of experiencing homelessness or housing instability	<p>A Household may demonstrate risk through a written attestation, which may include risk of eviction, lease termination or other financial impacts.</p>

3.2 Documenting Household is a Renter

To verify the Household is a renter, an applicant may provide the current lease or rent agreement. In cases where there is not a formal lease or rent agreement, such as month-to-month arrangements, the following documentation may be provided:

- Landlord attestation of rent paid
- Evidence of payments prior to the outstanding period, such as bank statements, Venmo, money order stubs, copies of checks, or other types of payment, demonstrating the landlord and rent amount
- A certification of the landlord tenant relationship if no other documentation is available; the certification will be reviewed during application processing for reasonableness

3.3 Determining Household Size and Composition

A Household is made up of all adults and children living in the Household at the time of application or re-application. This may include non-custodial children, unrelated adults, persons not listed on the lease, and persons living in the home temporarily.

All occupants, including unrelated adults living together under one lease or rent agreement, are considered a household.

Unrelated adults renting a room or otherwise under an arrangement to rent part of a home separately and who can demonstrate that arrangement would be considered a separate household.

All adults 18 years and older must provide their name, birthday, and income determination information.

If income determination documentation, such as 1040 tax returns or other benefit eligibility determination, includes adults who are no longer part of the Household and would put the applicant Household over the income limits, the applicant may wish to provide income documents for the individual showing a different residence, such as individual W2s, pay stubs, or benefit eligibility documents.

3.4 Determining and Documenting Income Eligibility

Determining Income

Income eligibility is calculated from the Household's annual income in 2020 or in current monthly income for the past eight weeks/60 days. Households must be at or below 80% AMI in accordance with the [U.S. Department of Housing and Urban Development's income limits](#) for 2021 by metro area and non-metro county.

The following income for all members of the Household **is included** in income calculation:

- The full amount of earned income before payroll deductions of any wages and salaries, overtime pay, commissions, fees, tips, bonuses, and other compensation for personal services
- The full amount of any payments received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of payments
- Any payments in lieu of earnings such as unemployment compensation, including Pandemic Emergency Unemployment Compensation (PEUC), disability compensation, worker's compensation, and severance pay
- Any public assistance payments such as cash assistance or Social Security.

- Any periodic and determinable allowances such as alimony, child support, and foster care payments
- Any net income from the operation of a business or profession, including direct payments for services or self-employment

The following types of income are **not included** in income calculation:

- Earned income of Minors (age 17 and under)
- One-time federal Household stimulus payments
- Income of live-in health aids
- Non-cash benefits such as childcare or medical care assistance and food support
- One-time cash gifts, for example a birthday

Verification of Household Income

There are three methods to obtaining Household income, such as the following:

1. Income documentation provided by the Household
2. Categorical Eligibility
3. Household self-certification, if Household unable to provide documentation of income.

1. Income Documentation

Documentation of income for 2020 includes:

- In cases where the Household has already prepared and submitted a 2020 federal tax return, IRS Form 1040 tax return may be used.
- In cases where the tax return is not available, all W2s and any 1099 forms may be used.

Documentation of current monthly income includes the past two months/eight weeks/60 days:

- If employed, obtain pay stubs. Pay stubs should be the most recent and just prior to the date the Household is seeking assistance. If a Household has inconsistent income, for example, they work varied hours, obtaining additional pay stubs is recommended.
 - If a Household is unable to provide pay stubs, third party verification from the employer is acceptable and should be clearly documented in the Household file.
- Documentation of cash assistance such as Social Security income or public assistance
- Documentation of child support, alimony, or foster care payments
- Documentation of any income received for self-employment

If a Household is without income, obtaining a self-certification of zero income is acceptable.

2. Categorical Eligibility

Renter Households who have a letter from a government program showing that the renter Household is income eligible for the program on or after January 1, 2020, and the program's income eligibility requires households to be at or below 80% of AMI, can receive categorical eligibility and do not need to provide additional income documentation. Minnesota Housing recommends that renter Households work with a case manager or government partner to obtain a letter of that determination.

3. Household Self-certification

If a household's income, or a portion thereof, cannot be documented using one of the above ways, Minnesota Housing may accept a written attestation from the applicant without further verification during the public health emergency related to COVID-19. If this method is used, Minnesota Housing will reassess the Household's income every three months upon reapplication, by obtaining appropriate documentation or a new self-attestation. Income attestations will specify the monthly or annual income claimed by the household to enable demonstrating income eligibility and appropriate reporting.

When using self-attestation, Minnesota Housing may request further income documentation from households at its discretion.

Minnesota Housing may accept written attestation if Household meets a fact specific proxy for income as defined by Minnesota Housing, including location within a low income zip code or participation in a public program.

3.5 Determining and Documenting Financial Hardship

To qualify for assistance, a Household must either have qualified for unemployment benefits or have experienced a reduction in Household income, incurred significant costs, or experienced other financial hardship due, directly or indirectly, to the novel coronavirus disease (COVID-19) outbreak, to which the applicant must attest.

Eligible or Receiving Unemployment Benefit

Applicants may certify that COVID-19 has negatively impacted their Household by certifying a member of a Household has qualified or qualifies for unemployment benefits.

Significant Costs or Other Financial Hardship

Applicants may certify that a member of their Household has experienced financial hardship due directly or indirectly to the COVID-19 pandemic.

Financial hardship may include:

- Reduction in Household income
- Significant cost increases
- Healthcare costs, including care at home for individuals with COVID-19
- Purchase of personal protective equipment (i.e., gloves, face masks, face shields)
- Penalties, fees, and legal costs associated with rental or utility payments owed

- Payments for rent or utilities made by credit card
- Moving costs to avoid homelessness or housing instability
- Increased childcare costs
- Internet access and computer costs required to work or attend school remotely
- Alternative transportation costs
- Forced leave from work due to school closure or childcare changes
- Other, as described by the applicant

3.6 Determining and Documenting Housing Instability

One or more individuals within the Household must demonstrate a risk of experiencing homelessness or housing instability, which may include a past due utility notice, rent notice, eviction notice, or any other evidence of such risk, including self-certification by the household.

Risk of homelessness or housing instability may include:

- Risk of eviction
- Risk of lease termination
- Living “doubled up” or in a place that is not a permanent residence for the individual
- Struggling to pay rent and utilities, or rent and utilities are more than a Household can afford
- Relying on credit cards or depleting savings to pay for rent or utilities
- Struggling to pay for essentials such as food, prescription drugs, childcare, or transportation
- Other, as described by the applicant

3.7 Priority Households

Renter Households who can demonstrate they are at or below 50% AMI or have been unemployed for 90 or more days at time of application will receive priority in the Minnesota Housing Program in the following ways.

- Targeted marketing and outreach efforts to reach priority Households will be used. For unemployed Households, Minnesota Housing expects to partner with the Minnesota Department of Employment and Economic Development’s Unemployment Insurance office to send direct mailings to benefit recipients. Broader marketing and outreach efforts also will focus on very low-income target markets (<50% AMI).
- Minnesota Housing’s partnership with Field Partners is specifically designed to help reduce barriers to the application process for Households with lowest incomes and

other targeted populations who have barriers to accessing assistance. Awards of contracts are weighted to organizations that were able to demonstrate appropriate marketing, access, and services to populations systemically impacted by housing stability during COVID-19.

- Minnesota Housing expects to reach a broad market of priority Households and expects to commit a significant share of funding expenditures for the full Program to priority Households. This share will be monitored by expenditures and number of applications throughout the life of the Program. If priority Households are not receiving assistance in conformance with program goals and objectives, Minnesota Housing will consider all appropriate actions to increase the processing of priority Households.

Chapter 4 – Eligible Expenses

4.1 Eligible Housing Expenses

At least 90% of Minnesota Housing’s expenditures for ERA1 and 75% of ERA2¹ must be for eligible housing expenses. Eligible expenses include the following:

- Rent payments
- Manufactured home park lot rents
- Documented utility bills (gas, electric, water/sewer, garbage/recycling, and other utilities as approved by Minnesota Housing)
- Additional housing related costs related to the current housing situation approved by Minnesota Housing and within the federal requirements, including: late fees, pet fees, eviction fees, payment plans.

Time Limits

The Program cannot provide assistance for costs dated prior to March 13, 2020. Past due April 2020 rent is the first eligible month of assistance for most renters on monthly leases. Under the first allocation of Emergency Rental Assistance funds to Minnesota Housing (ERA1), Households may receive up to 12 months of total assistance including up to three months prospective rents at a time. If funding remains available, and Households can demonstrate ongoing housing instability, an additional three months (for a total of 15 months) of assistance is available to Households. The second allocation of Emergency Rental Assistance made to Minnesota Housing (ERA2) allows up to 18 months of assistance, including the 15 months available under ERA1.

Minnesota Housing may, as needed to preserve housing stability, calculate months of assistance separately for rent, utility and other housing assistance. Under such circumstances, a Household that received one month of utility assistance may still be eligible for the maximum allowable months of rental assistance.

Future Rent Payments

For prospective payments, only prospective rent payments or other eligible rent expenses with a fixed, known, prospective payment are eligible.

Rent and Utility Arrears for Previous Dwelling

The U.S. Department of Treasury issued new guidance on August 25, 2021 to permit payment of rental or utility arrears after the tenant no longer resides in the unit in some circumstances. As a result, it is an eligible Program expense to provide assistance for rental or utility arrears after an otherwise eligible tenant has vacated a unit, if the tenant requests such assistance, in order to remove barriers a household may face in accessing new housing. Tenants may be asked to confirm that they are requesting payment of such arrears. Property owners must

¹ Up to 10% of expenditures for ERA2 may be used for Housing Stability Services and will be subject to provisions of a separate guide.

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agree not to engage in further collection efforts regarding the arrears that are paid or related fees or expenses and must agree not to pursue any further collection efforts against the household and must report the resolution of the arrears to applicable credit agencies. Landlord or utility providers should also notify the tenant that payment has been received and there will be no further collection efforts.

Due to processing requirements related to applications for previous dwellings, applications submitted to RentHelpMN on or after October 15, 2021 may be processed for rental or utility arrears for a previous dwelling as set out above. Any applicants seeking rental or utility arrears for a previous dwelling who submitted an application prior to that date may reapply with the additional information required.

Funding Amount

There are no program dollar caps on total assistance available to Households; however, Minnesota Housing will assess reasonableness in requested amounts and follow up for further documentation, if needed. If rent payments are not verifiable but deemed reasonable, rent payments will be capped at the Fair Market Rent (FMR) for the community.

Evictions

Landlords and property owners are prohibited from evicting a tenant for nonpayment of rent for any period covered by rental assistance through the Program.

4.2 Determining and Documenting Housing Expenses

Households may provide the following documentation for eligible housing expenses:

- For arrearages, Households may provide past due notices, bills, or other verification by eligible payee (e.g. landlord or utility company). Current utility expenses not yet in arrears should be documented through a bill or comparable documentation.
- For prospective rent, Households may provide a lease or rent agreement, other verification by eligible payee, or other appropriate documentation as determined by Minnesota Housing.

Partial Assistance

Applicants may request multiple types of assistance including rent, utilities and other housing expenses in one application or re-application. All assistance and all payees must be approved or declined in order for the application to move forward to payment on any and all assistance types. For each assistance type the applicant must provide adequate documentation to demonstrate the assistance requested and establish the payee. Minnesota Housing will prioritize the payment of rent assistance to help maintain housing stability. In the event that an applicant has been approved for rent assistance but has failed to adequately demonstrate the assistance needed or identify the payee for utility or other housing expenses, Minnesota Housing will decline the utility or other housing assistance request 5 days after requesting additional documentation in order to move forward with the rent assistance. The applicant may appeal the decision as outlined in the program guide.

4.3 Preventing Duplicate Assistance

The Program requires that Minnesota Housing, to the extent feasible, ensure that any rental assistance provided to an eligible Household pursuant to funds made available through the Program is not duplicative of any other Federally funded rental assistance provided to such household.

To meet this requirement, Minnesota Housing will require an applicant to certify they are not applying for or receiving benefits from any other source of assistance to pay for the amount of rent, utilities, and/or other housing costs they have applied to the Program for Household related expense(s) listed in the application.

Other Federal Rental Assistance

An eligible Household that occupies a federally subsidized residential or mixed-use property may receive assistance through the Program, provided these funds are not applied to costs that have or will be reimbursed under any other federal assistance.

If an eligible Household receives a monthly federal subsidy (e.g., housing choice voucher, public housing subsidy, or project-based rental assistance) and the tenant rent is adjusted according to changes in the Household income, the renter Household can only receive assistance for the tenant paid portion of the rent.

Under federal law, Minnesota Housing must review the household's income and sources of assistance to confirm the assistance does not duplicate any other federal assistance. Households must attest they will avoid duplication with other federal assistance.

Avoiding Duplication of Rental Assistance Among Other Direct Recipients of Emergency Rental Assistance Funding

With six local jurisdictions having coterminous programs through the same Treasury program, Minnesota Housing will, through data sharing agreements, conduct checks of potential duplicative requests using tools in the Common Household Application Portal and information provided from local jurisdictions.

As local jurisdictions operate programs outside of the Common Household Application Portal, such as the Zero Balance program, Minnesota Housing will exchange extracts of applicant and payment data to update the records for duplicate applicants accordingly.

4.4 Costs and Compliance Review

Minnesota Housing and its contractors will review applications for reasonableness and decline or change eligible amounts, or request clarification as necessary, to verify costs. Examples of applications that may warrant further review may include those with excessive costs, properties used for business purposes, family relationships between landlord and tenant, substantial rent increases, and lack of documentation.

The eligibility criteria for the program are reviewed using the compliance questions in Appendix C.

4.5 Exceptions and Waivers

Minnesota Housing and its contractors will review applications and associated documentation for full Program eligibility based on current Program requirements and Treasury guidance.

Applications that may be denied due to lack of verifiable documentation to demonstrate eligibility will be reviewed by a second tier of case management by the Processing Agent. If the Processing Agent is unable to decide Program eligibility, Minnesota Housing will make a final determination of an application’s eligibility for Program funding. Minnesota Housing may, in its sole discretion, provide exceptions and waivers in appropriate circumstances but may not provide waivers or exceptions to any federal requirements.

Chapter 5 – Payee Requirements

Under the Program, payments for prospective rent and rent and utilities must be made directly to landlords or utility providers, except in instances when the landlord or utility provider does not agree to accept a payment, on behalf of a Household, or is unresponsive. In those cases, payments can be made to the Household so the Household can make the payment directly.

5.1 Determining and Documenting Payee Eligibility

Housing Assistance payments will be paid to any of the following eligible entities:

- Landlord or leasing agent for a rental unit
- Utility company
- Manufactured home park owner
- Any other identified entity to which payment for an approved housing-related cost is owed
- Directly to the renter Household if the landlord or utility company will not cooperate with the program, so the Household can make the payment directly.

5.2 Payments

Payments to Landlords

Payments to landlords may be paid on a tenant-by-tenant basis or, if the application is initiated by a landlord, may also be paid via a batch process. **NOTE:** Landlords may be paid via ACH information from landlords or by a mailed check if ACH is not an option. Landlords will be required to provide a W9 and the federal government has determined that payments to landlords count as income for federal taxation purposes.

Payments to Utility and other Housing Providers

Payments to utility, home heating, or other housing providers will be paid directly to the provider via ACH or by a mailed check if ACH is not an option.

Payments to Households

Minnesota Housing must make reasonable efforts to obtain the cooperation of landlords and utility providers or other entities receiving housing related costs to accept payments from the Program. Outreach will be considered satisfactory if:

- A request for participation is sent in writing, by mail, to the landlord or utility provider, and the addressee does not respond to the request within 7 calendar days; or
- Minnesota Housing’s Processing Agent has made at least three attempts by telephone, text, or system-generated email over a 5-calendar day period to request the landlord or utility provider’s participation; or

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- The landlord or utility provider confirms in writing that the landlord or utility provider does not wish to participate or will not provide required documentation, or
- Only with ERA 2, Minnesota Housing determines that a direct payment is the best outcome given an applicant's unique circumstances.

Payments to households will be paid directly to the households via ACH or by a mailed check if ACH is not an option. Payments to Households are solely for approved eligible expenses so that the Household can make the payment directly to the landlord or utility provider.

Chapter 6 – Data and Reporting

6.1 Data Privacy and Security

To help protect the privacy of the individuals and Households in the program, Minnesota Housing requires that the Program be implemented in accordance with Treasury Directive: 85-0, which states “ All IT (information technology) systems operated on behalf of the Department of the Treasury shall be adequately protected to ensure confidentiality, integrity, and availability in order to minimize the risk of unauthorized access, use, disclosure, disruption, modification, or destruction”. The Treasury IT Security Program (TD P 85-01) has defined controls for providing such protection.

Minnesota Housing and its contractors use appropriate measures to help ensure the privacy of individuals and Households is protected through secure data storage of personally identifiable information in locations limited to required staff. In addition, additional confidentiality protections for data collected pertaining to any individuals who are survivors of intimate partner violence, sexual assault, or stalking will be further limited and redacted as needed.

6.2 Recordkeeping

Minnesota Housing will collect information from renter Household applicants to demonstrate their eligibility for the program, including the name, income, and other documentation provided by the Household. The full application detail may be found in Appendix B.

Minnesota Housing will collect all of the following elements related to an application to meet the reporting requirements from Treasury:

- Address of the rental unit
- Name, address, Social Security number, tax identification number or DUNS number, as applicable, for the landlord and/or utility provider
- Amount and percentage of monthly rent covered by the Program
- Amount and percentage of separately stated utility and home energy costs covered by the Program
- Total amount of each type of assistance (i.e., prospective rent, rental arrears, utilities and home energy costs, utilities and home energy costs arrears) provided to each Household
- Amount of outstanding rental arrears for each Household
- Number of months of rental payments and number of months of utility or home energy cost payments for which Program assistance is provided
- Household income and number of individuals in the Household
- Gender, race, and ethnicity for the primary applicant for assistance.

Minnesota Housing will maintain sufficient documentation of administrative expenses to demonstrate those expenses are within 10% of the total award, which is the maximum allowable under federal Program guidelines.

Records will be maintained for a period of six years after all funds have been expended or returned to Treasury.

6.3 Reporting

The following information outlines the reporting requirements that Minnesota Housing will submit to the federal government as required, as well as standardized public reporting.

Federal Reporting

Minnesota Housing will collect and report to Treasury on a range of data quarterly, including the following:

- The number of eligible Households that receive assistance from such payments
- The acceptance rate of applicants for assistance
- The type or types of assistance provided to each eligible household
- The average amount of funding provided per eligible Household receiving assistance
-
- Household income level, with such information disaggregated for Households with income that:
 - Does not exceed 30% AMI for the Household
 - Exceeds 30% AMI but does not exceed 50% AMI
 - Exceeds 50% AMI but does not exceed 80% AMI
- The average number of monthly rental or utility payments that were covered by the funding amount that a Household received, as applicable

For each of the above categories, reports will be disaggregated for Households by the gender, race, and ethnicity of the applicant .

Administrative costs and assistance costs that are approved will be reported as obligated, subject to the following. Administrative expenses that have been paid and/or subject to a contract with an entity or organization will be considered obligated. Assistance to eligible Households will be considered obligated if the application has been paid, is in an advanced payment processing stage, or has been reviewed and deemed eligible. Applications that have been deemed eligible for these purposes include those with payment sent, directly paid to applicant, in final review (including fiscal correction, pending landlord acceptance, and verification of payee), funding approved, have payments in process or are submitted for funding and pending a batch payment and comparable statuses as the agency has made a determination to pay those applications subject only to final logistical steps.

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Minnesota Housing will follow the requirements and reporting periods for submission in the detailed reporting guidance, as it may be amended, posted on [Treasury's website](#).

Public Dashboard

Minnesota Housing will make available a public dashboard with recent statistics and information about rental assistance activities across the state for the Minnesota Housing RentHelpMN Program. The dashboard will be available via [RentHelpMN.org](#).

Chapter 7 – Fair Housing and Title VI Policy

Title VI

This Program is subject to Title VI of the Civil Rights Act of 1964, as amended, which prohibits exclusion from participation, denial of the benefits of, or subjection to discrimination under programs and activities receiving federal financial assistance, of any persons in the United States on the ground of race, color, or national origin as implemented by federal regulations and executive orders.

Fair Housing:

It is the policy of Minnesota Housing to affirmatively further fair housing in all its programs so that individuals of similar income levels have equal access to Minnesota Housing programs, regardless of race, color, creed, religion, national origin, sex, marital status, status with regard to public assistance, disability, familial status, gender identity or sexual orientation.

Minnesota Housing's fair housing policy incorporates the requirements of the Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendment Act of 1988, as well as the Minnesota Human Rights Act. Housing providers are expected to comply with the applicable statutes, regulations, and related policy guidance. Housing providers should ensure that admissions, occupancy, marketing and operating procedures comply with non-discrimination requirements.

In part, the Fair Housing Act and the Minnesota Human Rights Act make it unlawful, because of protected class status, to:

- Discriminate in the selection/acceptance of applicants in the rental of housing units;
- Discriminate in terms, conditions or privileges of the rental of a dwelling unit or services or facilities;
- Engage in any conduct relating to the provision of housing that otherwise make unavailable or denies the rental of a dwelling unit;
- Make, print or publish (or cause to make, print or publish) notices, statements or advertisements that indicate preferences or limitations based on protected class status;
- Represent a dwelling is not available when it is in fact available;
- Deny access to, or membership or participation in, associations or other services organizations or facilities relating to the business of renting a dwelling or discriminate in the terms or conditions of membership or participation; or
- Engage in harassment or quid pro quo negotiations related to the rental of a dwelling unit.

Chapter 8 – Fraud, Misuse of Funds, Conflict of Interest, Suspension, and Disclosure and Reporting

8.1 Fraud

Fraud is any intentionally deceptive action made for personal gain or to damage another.

Any person or entity (including its employees and affiliates) that enters into an agreement with Minnesota Housing and witnesses, discovers evidence of, receives a report from another source, or has other reasonable basis to suspect that fraud or embezzlement has occurred must immediately make a report through one of the ways described in Section 8.05.

8.2 Misuse of Funds

An entity or Household that receives funds through the Program must use those funds for the intended use and have not obtained those funds through any misrepresentation or fraud. A misuse of funds shall be deemed to have occurred if the funds are not used for approved eligible expenses, adequate documentation cannot be provided regarding approved use of eligible expenses, the entity or Household made any misrepresentations in the application or any documentation or engaged in fraud, the entity or Households was not eligible or a duplicate payment was made, or any comparable misuse is deemed to have occurred as determined by Minnesota Housing.

For purposes of any contractor, Field Partner, or other entity that enters into a contract or grant agreement with Minnesota Housing related to the Program, the entity agrees to use the funds to engage in certain activities or procure certain goods or services while Minnesota Housing agrees to provide funds to pay for those activities, goods or services subject to the terms of the contract or grant agreement. Regardless of the Minnesota Housing program or funding source, the entity must use Minnesota Housing funds as agreed, and the entity must maintain appropriate documentation to prove that funds were used for the intended purpose(s). A misuse of funds shall be deemed to have occurred when: (1) Minnesota Housing funds are not used as agreed by an entity; or (2) a grantee cannot provide adequate documentation to establish that Minnesota Housing funds were used in accordance with the terms and conditions of the contract or grant agreement.

Anyone that discovers evidence, receives a report from another source, or has other reasonable basis to suspect that a misuse of funds has occurred should immediately make a report through one of the ways described in Section 8.05.

8.3 Conflict of Interest

This section applies only to contractors, Field Partners, or other entities that have entered into agreements with Minnesota Housing related to the Program. Such entities are subject to both federal and state conflict of interest standards.

Federal Conflicts of Interest Standard: Entities subject to this section must disclose in writing to Minnesota Housing any actual or apparent conflict of interest affecting the awarded funds in

accordance with 2 C.F.R. §200.112. Such information may also be reported to the U.S. Department of Treasury by Minnesota Housing.

Under the federal standard, no contractor, Field Partner, or other entities that have entered into agreements with Minnesota Housing related to the Program, or their employees, may participate in the selection, award, or administration of a contract supported by a federal award if they have a real or apparent conflict of interest. Such a conflict of interest would arise when the entity, the employee, or any member of their immediate family, their partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial interest in, or a tangible personal benefit from, a firm considered for a contract.

Immediate family includes the employee's spouse, partner, children, parents, siblings, and in-laws.

State of Minnesota Conflict of Interest Standard: A conflict of interest, actual, potential, or perceived, occurs when a person has an actual or apparent duty or loyalty to more than one organization and the competing duties or loyalties may result in actions which are

adverse to one or both parties. A potential or perceived conflict of interest exists even if no unethical, improper or illegal act results from it.

An individual conflict of interest is any situation in which one's judgment, actions or non-action could be interpreted to be influenced by something that would benefit them directly or through indirect gain to a friend, relative, acquaintance or business or organization with which they are involved.

Organizational conflicts of interest occur when:

- A contracting party is unable or potentially unable to render impartial assistance or advice to Minnesota Housing due to competing duties or loyalties
- A contracting party's objectivity in carrying out the award is or might be otherwise impaired due to competing duties or loyalties
- A contracting party has an unfair competitive advantage through being furnished unauthorized proprietary information or source selection information that is not available to all competitors

Once made aware of a conflict of interest under either the state or federal standard, Minnesota Housing will make a determination before disbursing any further funds or processing an award. Determinations could include:

- Revising the contracting party's responsibilities to mitigate the conflict
- Allowing the contracting party to create firewalls that mitigate the conflict
- Asking the contracting party to submit an organizational conflict of interest mitigation plan
- Terminating the contracting party's participation

Any person or entity (including its employees and affiliates) that enters into an agreement with Minnesota Housing must avoid and immediately disclose in writing to Minnesota Housing any and

all actual, perceived, apparent, or potential conflicts of interest through one of the ways described in Section 8.05.

8.4 Suspension

This section applies only to contractors, Field Partners, or other entities that have entered into agreements with Minnesota Housing related to the Program. By entering into any agreement with Minnesota Housing, a contracting party represents that the contracting party (including its employees or affiliates that will have direct control over the subject of the agreement) has not been suspended from doing business with Minnesota Housing. Refer to Minnesota Housing’s website for a list of [suspended individuals and organizations](#).

8.5 Disclosure and Reporting

Minnesota Housing promotes a “speak-up, see something, say something” culture whereby internal staff, external business partners (e.g., grantees, borrowers) and the general public are encouraged to report instances of fraud, misuse of funds, conflicts of interest, or other concerns without fear of retaliation. You may report wrongdoing or other concerns by contacting:

- Minnesota Housing’s Chief Risk Officer at 651.296.7608 or 800.657.3769
- Any member of Minnesota Housing’s [Servant Leadership Team](#) (visit mnhousing.gov and enter **SLT** in the Search box)
- [Report Wrongdoing or Concerns](#) (visit mnhousing.gov and enter **Wrongdoing** in the Search box)

Appendix A – Terms

Term	Definition
Automated Clearing House (ACH)	The automated clearing house (ACH) is an electronic funds-transfer system that facilitates payments in the U.S.
Area Median Income (AMI)	HUD defined incomes that reflect fair market rents for 80% and 50% AMI by metro area or non-metro county (link to HUD definitions)
Common Household Application Portal	Online application and reporting system Minnesota Housing has contracted with Allita360 to develop
Emergency Rental Assistance Program (ERA)	A federal program first enacted in December 2020 under Title V, Subtitle A, Section 501(a) of the Consolidated Appropriations Act, 2021 and a second round enacted under Section 3201(a) of the American Rescue Plan Act of 2021. ERA was established in response to the COVID-19 pandemic. counties or cities are direct recipients of
EthicsPoint	A Minnesota Housing hotline reporting service vendor
Fair Market Rents	Fair Market Rents (FMRs) are used to determine payment standard amounts or rent ceiling for many federal housing programs. (link to HUD Fair Market Rents)
Field Partner	A Minnesota Housing contracted nonprofit or local organization who provides individualized and culturally appropriate services to Households least likely to apply or be able to complete an application without assistance
Household(s)	<p>A Household is made up of all adults and children living in the Household at the time of application or re-application. This may include non-custodial children, unrelated adults, persons not listed on the lease, unborn children, or persons living in the home temporarily.</p> <p>Unrelated adults living together under one lease or rent agreement are considered a household. Unrelated adults renting a room or otherwise under an arrangement to rent part of a home separately and who can demonstrate that would be considered a separate household.</p> <p>Also referred to as renter Households.</p>
Minnesota Housing Finance Agency	The state’s housing finance agency; also referred to as Minnesota Housing
Minor	An individual age 17 or younger

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Term	Definition
Pandemic Emergency Unemployment Compensation (PEUC)	PEUC is an emergency relief program designed to help individuals affected by the COVID-19 pandemic and is established by the CARES Act.
Program	COVID-19 Emergency Rental Assistance Program, also known as RentHelpMN
RentHelpMN Administrator(s)	Entities administering Program funds within the Common Household Application Portal. Program Administrators may include Minnesota Housing, the counties of Hennepin, Dakota, Ramsey, and Washington, and the cities of Minneapolis and St. Paul
Treasury	The U.S. Department of the Treasury
Processing Agent	Minnesota Housing has contracted with Witt O’Brien’s, who will review applications, evaluate applicant eligibility, validate requested expenses and payee information, make a payment determination, facilitate payment processing, and perform other duties related to the Program
211	Greater Twin Cities United Way 211 is an entity with whom Minnesota Housing has contracted to provide the public facing intake point for the Program

Appendix B – Common Household Application

(Forthcoming) Once published, a current application may be found at www.RentHelpMN.org

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RentHelpMN COVID-19 Emergency Rental Assistance Application

If you have experienced hardship due to COVID-19 and need assistance to pay your rent or utility bills, you may be eligible for **RentHelpMN**.

Appendix C – Case Management Validation Questions

The following set of questions are utilized by the case managers at Minnesota Housing’s processing agent to make determinations about an applications eligibility. Answers of “No” do not mean a determination of ineligibility, but may require further review by case manager.

1. All household application information is complete.
 - Yes; all fields are completed.
 - No; missing data. (See Notes Section for details.)

2. Head of Household Identification is supported as required in the program guidelines.
 - Yes; the file includes a document supporting the head of household’s identification.
 - No; the file does not include supporting documentation for the head of household’s identification.

3. Confirm Household Size matches the number of household members listed.
 - Yes; confirmed household size.
 - No; the number of household members with data does not match the total number of household members (missing data on individuals).

4. Identity Confirmation
 - Yes; supporting documents appear to be authentic and unaltered.
 - No; supporting documents may have been altered or are not authentic.
 - Yes; proof of identity is current or expired in 2020 or later.
 - No; proof of identity has expired in 2019 or earlier.
 - Yes; spelling of names in signatures, identification and application match throughout the system and documents.
 - No; there are discrepancies in the spelling of names in signatures, identification and application match throughout the system and documents.
 - Yes; Birth date on identification matches birth date in application.
 - No; there are discrepancies in the dates of birth on the identification and the dates in the application.
 - Yes; there is only one application in the system for each adult on the application.
 - No; there are multiple applications for adult household member(s) on the application.

5. Occupancy Confirmation
 - Yes; supporting documents appear to be authentic and unaltered.
 - No; supporting documents may have been altered or are not authentic.
 - Yes; nothing indicates a familial relationship between the resident and landlord.
 - No; there is an indication of a familial relationship between the resident and landlord.
 - Yes; the lease or supporting documents for rent have an effective date prior to March 1, 2021.

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- No; the lease or supporting documents for rent have an effective date March 1, 2021 or later.
 - Yes; the number of household members is appropriate for the number of bedrooms.
 - No; the number of household members exceeds the number of bedrooms by 2 times.
6. Assistance – Rent: Does the household owe back rent?
- Yes; confirmed back rent is due.
 - No; no back rent is due.
7. Assistance – Rent: Does the rental assistance requested and supporting documentation meet the program guidelines and the criteria of the current application intake phase?
- Yes.
 - No.
8. Assistance – Rent: Has the landlord provided the certification and verified the amounts of rent due and provided the necessary documentation required in the program guidelines?
- Yes.
 - No; Tenant has submitted self-verification of rent and proof of rental paid amounts.
 - No; Tenant has submitted self-verification and rent is self-reported and within the fair market rent limits.
 - No; Tenant information submitted is not sufficient.
9. Rent Confirmation
- Yes; supporting documents appear to be authentic and unaltered.
 - No; supporting documents may have been altered or are not authentic.
 - Yes; claimed rent is below 150% of the Fair Market Rent (FMR).
 - No; claimed rent exceeds 150% of Fair Market Rent (FMR).
 - Yes; the landlord confirms participation in the program and the value of rent and fees due validated by the landlord matches the amount requested by the household.
 - No; the value of rent and fees validated by a landlord does NOT match the amount requested by the household.
 - If No, did the landlord document the amount of rent, fees and penalties?
 - No; the landlord refuses to receive program payment(s) for a specific applicant/application.
10. Assistance – Utilities: Does the assistance requested for utilities payments and all supporting documentation meet the program guidelines?
- Yes.
 - No.
11. Utilities Confirmation
- Yes; supporting documents appear to be authentic and unaltered.
 - No; supporting documents may have been altered or are not authentic.
 - Yes; the values on statements match applicant entries.

- No; the amounts on the statements are different from the amount requested by the applicant.
 - No; a utility company refused to accept payment(s) for a specific applicant/application.
12. Assistance – TOTAL amount of assistance has been verified per program guidelines.
- Yes.
 - No.
13. Income – Does the household income meet the requirements as required in the program guidelines?
- Yes; **1040 annual income** documentation was submitted to support the household meets the income limits.
 - Yes; **Monthly income** documentation was submitted to support the household meets the income limits.
 - Yes; **Categorical eligibility** document dated 1/1/20 or later submitted to support income.
 - Yes; **Certification** of income or no income submitted.
 - Yes; **Multiple methods** (1040 annual, monthly, and/or certification regarding income) used.
 - No; the income information submitted does **not** support income qualification.
14. Income Confirmation
- Yes; all supporting documents appear to be authentic and unaltered.
 - No; supporting documents may have been altered or are not authentic.
 - Yes; there are no instances of an applicant claiming to be unemployed and receiving income from a job during the same period.
 - No; an applicant claims to be unemployed and reports receiving income from a job during the same period.
 - Yes; all applicants within a household claim to have income.
 - No; all applicants within a household claim to have zero income.
15. COVID-19 Unemployment – Does the application indicate at least one member of the household has qualified for unemployment benefits or experienced financial hardship as required by the program guidelines?
- Yes; a member of the household has qualified for unemployment benefits after March 13, 2020.
 - Yes; a self-certification was submitted that a member of the household experienced an identified financial hardship after March 13, 2020.
 - No; the file does not support unemployment or financial hardship after March 13, 2020.
16. COVID-19 Risk of Homelessness or Housing Instability – Does the file support the household has experienced a risk of homelessness or housing instability at any time after March 13, 2020 as required by the program guidelines?

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- Yes; the household can demonstrate a risk of homelessness or housing instability March 13, 2020 or later.
- No; the file does not support a risk of homelessness or housing instability March 13, 2020 or later.

17. Documentation – All required documentation based on the household circumstances has been received, reviewed, and accepted.

- Yes.
- No.