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RentHelpMN – Targeted Assistance

COVID-19 Emergency Rental Assistance Targeted Assistance Program Guide



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Chapter 1. Introduction

This guide represents Minnesota Housing Finance Agency's (Minnesota Housing) implementation of the COVID-19 Emergency Rental Assistance Program known as RentHelpMN – Targeted Assistance (Program) for direct rental and utility assistance. Separate program guides define the first RentHelpMN program and Housing Stability Services. The Secretary of the Treasury, as head of the United States Department of the Treasury (Treasury), has also defined "other housing expenses" that Minnesota Housing has authorized for capital funding for affordable housing. Other housing expenses will be reflected in its own program guide.

The COVID-19 Emergency Rental Assistance 2 (ERA 2) Program, known as "RentHelpMN – Targeted Assistance," was funded in the American Rescue Plan Act Program and provides direct assistance for renter Households that have experienced or are at risk of financial hardship due to or during the COVID-19 pandemic. The assistance is meant to help prevent homelessness and maintain housing stability. Minnesota Housing received allocations of ERA 2 funds totaling \$255.4 million. This funding is subject to Uniform Grants Guidance 2 C.F.R. Part 200 and all applicable Treasury guidance and regulations. The federal assistance number assigned to the COVID-19 Emergency Rental Assistance is 21.023.

RentHelpMN – Targeted Assistance provides renter households access to assistance through Housing Stability Services (HSS) Providers. Minnesota Housing has approximately \$42.5 million available for the operation of this Program, including funds for administrative costs and services. All ERA 2 funds must be fully obligated by September 30, 2025.

Eligible applicants are renter Households with incomes at or below 80% area median income (AMI), who have experienced financial hardship through the COVID-19 outbreak and who can demonstrate a risk of experiencing homelessness or housing instability. Homeowners are not eligible for RentHelpMN – Targeted Assistance funds. The funds may be used for rent, utilities and other rental housing costs (both in arrears and future rent), within RentHelpMN – Targeted Assistance Program limits, as described in this program guide.

Section 1.1 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); people with disabilities; veterans; and lesbian, gay, bisexual, transgender, or questioning/queer (LGBTQ+) populations.

Minnesota Housing will work with a network of service providers to help initiate online applications for targeted renter households. In addition, renter Households who have very low incomes (less than 50% AMI) and renter Households with a member experiencing unemployment for 90 or more days at the time of application will be prioritized.

Section 1.2 Community Engagement

Minnesota Housing released a survey on December 1, 2022 requesting public input on how the Agency should prioritize the use of remaining funds under the federal ERA 2 Program. The survey explained that the \$75 million in ERA 2 funds (which has increased to \$85 million since the survey) is not enough to reopen the RentHelpMN program, as application requests would far exceed the funds available.

Respondents provided feedback regarding how the funds should be used and which households and housing situations should be served. Based on the survey responses, the RentHelpMN – Targeted Assistance Program was developed.

Section 1.3 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 (https://www.renthelpmn.org/) website. This Program is subject to federal requirements related to ERA 2, and Minnesota Housing has no discretion to modify federal requirements.

The following website/URL provides more information on the <u>Treasury's Emergency Rental Assistance program</u> (https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/emergency-rental-assistance-program).

This document is specific to Minnesota Housing's administration of the RentHelpMN – Targeted Assistance 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 parameters of this guide, are expressly subject to, and limited by, available federal Emergency Rental Assistance resources that Minnesota Housing administers.

Chapter 2. Program Process

Section 2.1 Targeted Assistance Program

RentHelpMN – Targeted Assistance is an emergency rental assistance program for Minnesota renters receiving Housing Stability Services (HSS) from HSS Providers and who would benefit from direct financial support to cover rent arrears, future rent, utilities and other rental housing expenses due to or during the COVID-19 pandemic.

A renter Household will access RentHelpMN – Targeted Assistance through HSS Providers. The HSS Providers will refer HSS eligible households to the Processing Agent. The Processing Agent will screen the renter for potential eligibility under program guidelines and, if appropriate, initiate an 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 based on information provided by the Processing Agent.

Section 2.2 General Application Lifecycle

In general, applications for assistance will follow the steps outlined below.

- HSS Providers conduct outreach and marketing activities according to their individual contracts with Minnesota Housing for these services.
- HSS Providers intake eligible HSS renter Households.
- Minnesota Housing will assign HSS Providers referral slots monthly (or more frequently as necessary), accounting for geographic distribution, community reach, organizational capacity and other factors.
- HSS Providers will refer a renter Household to the Processing Agent by logging basic household contact information necessary to open an application for assistance.
- The Processing Agent will search for the renter Household in the application system and determine if they have exhausted eligible assistance.
- The Processing Agent will initiate an application for renter Households that have not exhausted eligible assistance.
- The renter Households will receive an email with a link to the Common Application Portal, where renter Households will complete an application, or the renter Household will work with the Processing Agent to complete and submit a paper application.

- The Processing Agent will conduct outreach to the renter Household to assist in application completion.
- The Processing Agent will identify the property owner/property manager for the property, connect the application to the property owner/property manager and conduct payee validation, if applicable.
- Once an application is complete and submitted, the Processing Agent will determine eligibility and make a final determination, either denied or eligible. Based on the application approval process, the amount of assistance is determined. If an application is denied, the applicant has 10 days from the notice of denial to appeal.
- Minnesota Housing will make payments to verified payee, which could be a property owner/property manager, tenant or utility company.

Section 2.3 HSS Provider Role

Minnesota Housing engages a network of community providers under contract with the Agency to provide Housing Stability Services. The expectation is that HSS Providers will provide culturally appropriate outreach and intake services to renter Households, including applicants likely to encounter barriers with the application system process.

Each HSS Provider has a contract and work plan with Minnesota Housing that outline methods of outreach, marketing and intake for clients eligible for eviction prevention and housing navigation services. As part of eviction prevention activities, HSS Providers may refer renter Households to RentHelpMN – Targeted Assistance for direct assistance with rent, utilities and other housing expenses.

Each participating HSS Provider will receive an allocation of referral slots monthly or more frequently from Minnesota Housing and may continue to refer clients to open slots as they are available.

Minnesota Housing will determine the allocation of referral slots and will adjust as needed to maintain prioritization, regional distribution and steady progress aligned with Processing Agent capacity to process applications. The total number of referral slots and the allocation of referrals to each HSS Provider will be adjusted throughout the duration of the Program.

Once a renter Household has been referred to initiate an application, the HSS Provider may choose to continue to work with the renter Household through the application and eligibility determination process, but they are not required to do so. Additionally, optional follow-up by the HSS Providers is not a substitute for the primary efforts by the Processing Agent to ensure that applicants are able to complete and submit applications.

Section 2.4 Common Household Application Portal

The Household will complete the Common Household Application via the online system, which can be accessed through a secure link after an application has been initiated by the Processing Agent or by the Processing Agent providing a paper application. The system will:

- Allow the Processing Agent to create applications and initiate account creation for renter households who have been pre-screened.
- Allow renter households to confirm 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 responding to the Processing Agent.
- Allow renter Households to save their applications and return to complete at a later time.
- Allow the Processing Agent to view and send secure communications, view all documents uploaded into the system and generate payment authorization requests.
- Allow the Processing Agent to create reports via a built-in reporting engine.
- Using the Portal, Processing Agent will flag duplicate applications so they can be investigated during application processing.
- Allow property owners/property managers the ability to log into a dashboard to view and check the status of their renter Household's applications.

In addition to Minnesota Housing, 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 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.

Section 2.5 Housing Assistance Application Processing – Witt O'Brien's

Minnesota Housing has contracted with a centralized Processing Agent, Witt O'Brien's, to conduct application processing activities.

Section 2.6 Application Processing Workflow

To begin the process, the HSS Provider will create a referral to the RentHelpMN – Targeted Assistance Program on behalf of the applicant. The HSS Provider will provide applicant information to the Processing Agent through an online secure portal.

Once an HSS Provider completes the referral, the information will be used by the Processing Agent to verify if the applicant has exhausted eligible assistance. If the Applicant has not exhausted eligible assistance, the Processing Agent will provide to the Applicant a link to the RentHelpMN – Targeted Assistance Portal. This link will allow the Applicant to create either a first-time application for assistance or a re-application for assistance in cases where the applicant has previously been provided assistance but has not yet reached the 18-month program limit.

If the Processing Agent verifies that the household has previously received the maximum amount of rental and/or utility assistance, the Processing Agent will inform the HSS Provider that the referral is unable to be made to the RentHelpMN – Targeted Assistance Program.

In order to be processed, an application must be completed and submitted. In the online portal, an application is considered submitted only after all required fields are filled out, all required signatures are provided, and the applicant has clicked "done" and "ok" to confirm submission. A paper application from a valid referral is considered submitted if all required fields, documentation and required signatures are provided and the paper application has been received by the Processing Agent.

In instances where the Processing Agent has initiated an application for a household, but that Household has not yet submitted the application for review, the Processing Agent will reach out to the applicant to assist in the completion process. The Processing Agent will make at least three attempts in 14 days to contact the Household to assist in completing and submitting the application.

Once applications are submitted, the Processing Agent will conduct a complete review of the application, evaluate for eligibility of the 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 processing 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. For Pending Applications, the Processing Agent will reach out to applicants or their designee, as necessary, to obtain documentation required to process the application. An "incomplete" status is not a pending status, as the application has not been submitted.

When an application is denied, the applicant has 10 days from the notice of denial to appeal per the appeal instructions. If no appeal is submitted, the denial is final. If a timely appeal is submitted, an application is considered pending appeal until a final determination is made on the appeal.

Once the application has been submitted, the Processing Agent will work with the applicant throughout the application process to ensure that the application has the required documentation to allow for a comprehensive review for rental and utility assistance. If the Processing Agent determines that there is additional information necessary to complete the eligibility review, the Processing Agent

will reach out to the Applicant by sending correspondence within the Common Household Application Portal or by telephone at least three times in 14 days.

If the payment is deemed eligible, the Processing Agent will submit a request to Minnesota Housing to make the payment and update the status of the application as paid in the application system. Payments are made to the verified payee, which could be a property owner/property manager, renter Household or utility company.

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 applicant.

The Processing Agent will notify the HSS Providers once an applicant has received their final disposition status. Applicants will be notified via communication in the Common Household Application Portal.

Section 2.7 Appeals, Re-Application and Withdrawals Policies

(a) Re-Application Policy

In order to re-apply, applicants will need to return to HSS Providers to receive a new referral if more assistance is needed. Applicants may have the option to re-apply through the HSS Provider by contacting that provider.

(b) Appeals Policy

If an applicant is deemed ineligible, a written denial letter will be sent to the applicant listing the reasons for denial via communication in the Common Household Application Portal or the U.S. Postal Service. 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 the appeal instructions found on the Program website, within 10 days of the date of the transmission 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 following the same appeal process.

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.

After receiving a request for an appeal, the Processing Agent will assign a designated 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 appeal." 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 communication in the Common Household Application Portal 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 Program funds are available on the date of the appeal decision. A successful appeal decision does not guarantee receipt of assistance.

(c) Withdrawal Policy

Applicant may request a withdrawal at any time.

(d) Incomplete Withdrawals

Incomplete applications that have been referred by the HSS Provider but have not been completed and submitted by the renter Household must be completed within 14 days of the referral and after three attempts to contact the renter Household within that period. If the application is incomplete after 14 days, it will be considered "withdrawn."

(e) Incomplete Denials

Submitted Pending Applications that require additional information in order to be processed are deemed denied if the Applicant provides no response after the Process Agent makes three attempts to contact the Applicant within 14 days of submission. The applicant may appeal the determination of non-responsiveness by demonstrating that the applicant did make reasonable attempts to complete the application or contact the Program for assistance. This appeal must be received within 10 days of the transmission of the denial letter.

Section 2.8 Language Access and Reasonable Accommodation Policy

Application, marketing materials and print materials will be provided in English, Spanish, Somali and Hmong as feasible. The Processing Agent will facilitate translation services should the need arise during the application process.

As needed and as appropriate, reasonable accommodations can be addressed by the HSS Providers and Processing Agent throughout the application process to help ensure that accessing the Program is equitable for applicants with disabilities.

Section 2.9 Recoupment and Repayment

Payees that receive assistance for ineligible expenses are required to promptly return the payment in full or in part to RentHelpMN – Targeted Assistance. RentHelpMN – Targeted Assistance has a repayment form available on the Program website.

When accepting payment for rent and future rent assistance, property owners/property managers attest that the payment will be applied to eligible expenses on behalf of the renter Household or the funds will be returned. Payments for future rent that remain when a renter Household moves out early must be returned to RentHelpMN – Targeted Assistance.

If an assistance payment has been received in error, was used for ineligible expenses or was obtained through fraudulent means, the payment must be promptly returned. If a property owner/property manager or other entity becomes aware of any such payment, they must notify the Processing Agent immediately. The Processing Agent will send communication to payees who have been determined to have received ineligible assistance and demand repayment. A description of the process for appealing the determination will also be included in the communication.

Section 2.10 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. In addition, nine Tribal Nations in Minnesota received separate direct allocations, with those programs ending on December 31, 2022, per Treasury guidance.

If Minnesota Housing has knowledge that a renter household has an application in process with another federal ERA-funded program, the Minnesota Housing application will be placed in an inactive status. Minnesota Housing will contact the applicant for more insight, after which Minnesota Housing will determine if the application can be placed back in an active status. Minnesota Housing will determine the amount of assistance received and if the Household is eligible for further assistance.

Chapter 3. Household Eligibility

Section 3.1 Eligible Renter Households

To qualify for RentHelpMN – Targeted Assistance, renter Households must meet all criteria listed below:

Households (must meet all of the following)	Eligibility Criteria
Be a low-income renter in Minnesota	The assistance must be for the renter's primary residence where a legitimate rent obligation can be established.
	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>U.S.</u> <u>Department of Housing and Urban Development Income Limits</u> (https://www.huduser.gov/portal/datasets/il.html). Renter Households at or below 50% AMI are prioritized as described in Section III.7.
	Household income will be verified to establish eligibility in Minnesota; exceptions apply.
Have qualified for unemployment benefits or experienced financial hardship during the coronavirus outbreak	A Household may demonstrate financial hardship through a written attestation, which includes qualification for unemployment benefits or other financial hardship.
Can demonstrate a risk of experiencing homelessness or housing instability	A Household may demonstrate risk through a written attestation, which may include risk of eviction, lease termination or other financial impacts.

Section 3.2 Documenting Household is a Renter

To verify the Household is a renter with a rent obligation for their primary residence at an address in Minnesota, an applicant must 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:

Property owners/property managers attestation of rent paid; or

- Evidence of payments prior to the outstanding period, such as bank statements, Venmo, money order stubs, copies of checks, other types of payment or tax returns verifying the property owners/property managers and rent amount; or
- A certification of the property owner/property manager and renter household relationship if no other documentation is available; the certification will be reviewed for reasonableness during application processing and can be rejected.

Section 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, people not listed on the lease, unborn children and people 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, date of birth and income determination information.

If income determination documentation, such as IRS Form 1040 tax returns or other benefit eligibility documentation, includes adults who are no longer part of the Household and would put the applicant Household over the income limit, the applicant may certify that the other adult(s) is (are) no longer in the Household. Minnesota Housing can provide a form to complete this certification. The form is also available on the Program website.

Section 3.4 Determining and Documenting Income Eligibility

(a) Determining Income

Income eligibility is calculated from the renter Household's annual income in 2022 or in current monthly income for the past eight weeks/60 days. Renter Households must be at or below 80% AMI in accordance with the <u>U.S. Department of Housing and Urban Development's income limits</u> (https://www.huduser.gov/portal/datasets/il.html) for 2022 by metro area and non-metro county.

Renter Households will demonstrate their income by one of the methods listed below. The Processing Agent will determine the household income and whether it is within the applicable program limits.

Processing Agents may request additional information in order to accurately determine household income. Failure to demonstrate income within the applicable limits is a reason for denial.

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 (including for minor children)
- 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

(b) Verification of Household Income

There are multiple methods to obtaining household income, such as the following:

- Income documentation provided by the Household
- Categorical eligibility
- Household self-certification (if Household is unable to provide documentation of income)
- Fact-specific proxy with household's self-certification

(i) Income Documentation

Documentation of income for 2022 includes:

- In cases where the Household has already prepared and submitted a 2022 federal tax return, IRS Form 1040 tax return may be used.
- In cases where the tax return is not available, all W-2s 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's 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.

(ii) 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, then these renter Households 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.

(iii) 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. If this method is used, Minnesota Housing will reassess the Household's income every three months upon re-application, 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.

(iv) Fact-Specific Proxy

Minnesota Housing may accept written attestation if the renter 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.

Section 3.5 Determining and Documenting Financial Hardship

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

(a) Eligible or Receiving Unemployment Benefits

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.

(b) Significant Costs or Other Financial Hardship

Applicants may certify that a member of their Household has experienced financial hardship during or 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

Section 3.6 Determining and Documenting Housing Instability

One or more individuals within the Household must attest to a risk of experiencing homelessness or housing instability during or due, directly or indirectly, to the COVID-19 pandemic.

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
- Struggling to pay rent and utilities, or rent and utilities that 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, which may include unsafe or unhealthy living conditions

Section 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 Program in the following ways.

Minnesota Housing's partnership with HSS Providers is specifically designed to help reduce barriers to the application process for Households with the lowest incomes and other targeted populations who have barriers to accessing assistance. Awards of contracts to HSS Providers were weighted to organizations that were able to demonstrate marketing, access and services to populations systemically impacted by housing instability during the COVID-19 pandemic.

Minnesota Housing expects to reach a broad cross section of priority Households through HSS Providers and expects to commit a significant share of the remaining funding to priority Households. Expenditures and number of applications will be monitored 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 applications from priority Households.

Section 3.8 Eligible Expenses

(a) Eligible Housing Expenses

Eligible direct assistance housing expenses include the following:

- Rent for the Household's primary residence:
 - o Rent payments for arrears dating March 13, 2020, or later
 - Rent payments for three months forward rent, including any regular, recurring fees and charges paid to the property owner/manager
 - Utility and home energy costs listed in the lease or household agreement covered by the property owner/property manager and paid by the renter Household are considered rent
 - o For units with voucher assistance, only the tenant-paid portion of rent
 - For properties that include both residential and commercial, farm or other uses, only the portion of rent clearly attributable to the Household's primary residence
 - Hotel and motel payments for accommodations that serve as the Household's primary residence
 - Manufactured home park lot rent, including three months forward
 - Documented utility bills in the renter's name back to March 13, 2020, or later (gas, electric, water/sewer, garbage/recycling and other utilities, as approved by Minnesota Housing). An owner of a manufactured home on a rented lot may apply for utility assistance if utility payments are established in their name.
- **Eligible** other rental housing-related costs for the Household's primary residence, approved by Minnesota Housing and within federal requirements, which may include:
 - Late fees, subject to review within the state maximum of 8%, including prospective late fees if the assistance payment will be received after the rent due date and the fee would be incurred
 - Parking fees
 - Pet rent or pet fees that are regular and recurring
 - Utility charges paid to the property owner/property manager, including prospective utility charges if the amount is regular and recurring
 - Internet or media charges paid to the property owner/property manager, as demonstrated by a lease or rent agreement
 - Damages to the unit and charged within the eligible time period will be reviewed for reasonableness on a case-by-case basis
 - Charges such as lock-out fees or common area damage fees, as demonstrated on an invoice, ledger or bill and subject to review for reasonableness on a case-by-case basis

Legal and eviction costs will be reviewed for reasonableness on a case-by-case basis

Expenses that would be **ineligible** for assistance include:

- Any rent, utilities or fees incurred prior to March 13, 2020
- Return of damage deposits to the renter household
- Mortgage or loan payments on a home or manufactured home
- Charges by the property owner/property manager or third party for participating in or assisting with the application for RentHelpMN Targeted Assistance
- Furnishings
- Transportation costs
- Moving expenses
- Medical services, meals and caregiving

Section 3.9 Payment Plans

If the renter Household has entered into a payment plan for past-due rent, the past-due amounts or monthly plan payments may be eligible for assistance. If the payment plan is for rent arrears incurred on or after March 13, 2020, the entire balance may be eligible for assistance in the months in which the arrears were incurred, subject to the limit of 18 months of assistance per household. If the arrears were incurred prior to March 13, 2020, and/or are for more than 18 months of assistance, the required monthly payment on the payment plan may be considered eligible rent in the month that the payment plan installment is due. This would be treated as rent for the purpose of the application.

Section 3.10 Contract for Deed and "Rent-to-Own"

Payments to the property owner/property manager on certain rent-to-own arrangements may be eligible for assistance, subject to review and approval by Minnesota Housing. Circumstances must also adhere to Treasury requirements. In Minnesota, most formal contract for deed agreements will not be eligible. To be eligible, the applicant must meet the following criteria:

- Is not a signor or co-signor to the mortgage on the property
- Does not hold the deed or title to the property
- Has not exercised the option to purchase

Section 3.11 Housing with Services

Rent and utility costs for persons living in assisted living, nursing care and other board-and-lodge facilities may be eligible for assistance subject to Minnesota Housing review. To be considered for assistance, the Household must be able to clearly document the housing costs attributable to rent separate from any medical services, meals, caregiving or other ineligible expenses.

(i) Housing Support vouchers

Renters who pay their tenant rent contribution to a nonprofit third party while receiving state Housing Support (formerly Group Residential Housing or GRH) rent assistance may be eligible, subject to review and approval by Minnesota Housing.

Section 3.12 Time Limits

Program funds 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 renter households on monthly leases. The second allocation of Emergency Rental Assistance made (ERA 2) allows up to 18 months of assistance per renter household, including the 15 months available under Emergency Rental Assistance provided for by the Consolidated Appropriations Act of 2021.

Minnesota Housing may, as needed to preserve housing stability, calculate months of assistance separately for rent, utilities 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.

Minnesota Housing may, as needed to preserve housing stability, provide a partial payment up to the maximum of 18 months of assistance. In calculating partial payments, Minnesota Housing will first assist the Household for the months with the greatest amounts due. Minnesota Housing would also first address arrears prior to approving forward rent. The Program staff or Processing Agent may also advise the renter Household that small amounts of assistance received in any given month, such as fees, could count towards the 18 months of assistance total.

Section 3.13 Future Rent Payments

For future rent payments, only future rent payments or other eligible rent expenses with a fixed, known payment are eligible. This may result in partial payment of forward rent where only a portion is fixed and known.

Section 3.14 Rent and Utility Arrears for Previous Dwelling

Treasury issued guidance on August 25, 2021, to permit, in some circumstances, payment of rental or utility arrears after the renter Household no longer resides in the unit. As a result, it is an eligible Program expense to provide assistance for rental or utility arrears after an otherwise eligible renter Household has vacated a unit if the renter Household requests such assistance in order to remove barriers a Household may face in accessing new housing. Renter Households may be asked to confirm that they are requesting payment of such arrears. Property owners/property managers must 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 renter Household for any period that was covered by RentHelpMN – Targeted Assistance. Property owners/property managers must report the resolution of the arrears to applicable credit agencies. Property owner/property managers or utility providers should also notify the renter Household that payment has been received and there will be no further collection efforts.

Section 3.15 Funding Amount

There are no Program dollar caps on total assistance available to renter Households; however, Minnesota Housing will assess reasonableness in requested amounts and will request 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.

Section 3.16 Evictions

Property owners/property managers that receive assistance payments directly are prohibited from evicting a renter Household for nonpayment of rent for any period the Household was covered by RentHelpMN – Targeted Assistance Program funds.

Chapter 4. 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 the eligible payee (for example, the property owner/property manager 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.

Section 4.1 Partial Assistance

Applicants may request multiple types of assistance, including rent, utilities and other housing expenses in one application or re-application. 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 rental assistance to help maintain housing stability. In the event that an Applicant has been approved for rental 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 five days after requesting and not receiving additional documentation in order to proceed to payment of the rental assistance. The Applicant may appeal the decision as outlined in Section 2.7.

Section 4.2 Preventing Duplicate Assistance

RentHelpMN – Targeted Assistance 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 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 rent, utilities and/or other housing costs they listed in their application for RentHelpMN – Targeted Assistance funds.

Applicants may layer assistance and receive RentHelpMN – Targeted Assistance in addition to programs such as Housing Choice Vouchers and energy assistance, so long as assistance is not received for the same housing costs from more than one program.

Section 4.3 Other Federal Rental Assistance

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

If an eligible renter Household receives a monthly federal subsidy, such as a housing choice voucher, public housing subsidy or project-based rental assistance, and the tenant rent is adjusted based on changes in the Household income. The renter Household can only receive RentHelpMN – Target Assistance for the tenant 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 rental assistance.

Households must attest they will avoid duplication with other federal assistance.

Section 4.4 Avoiding Duplication of Rental Assistance Among Other Direct Recipients of Federal Emergency Rental Assistance Funding

With six local jurisdictions operating 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.

Local jurisdictions operate some programs outside of the Common Household Application Portal. Minnesota Housing and local jurisdictions will exchange applicant and payment data to verify records for duplicate applicants.

Section 4.5 Avoiding Duplication of Rental Assistance Among Other State and Local Programs

Renter Households are discouraged from applying for multiple rental assistance programs for the same months and costs. Duplicate payments must be returned.

Section 4.6 Costs and Complicated 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 property owners/property managers and renter households, substantial rent increases and lack of documentation.

Section 4.7 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.

The Processing Agent makes the first determination of eligibility. Applications that may be denied due to lack of verifiable documentation needed 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 RentHelpMN – Targeted Assistance, payments for rent will first be offered directly to property owners/property managers. In instances when the property owner/property manager does not agree to accept a payment or is unresponsive, payments can be made to the renter household so the renter household can make the payment directly.

Payments may be made directly to the household without first offering payment to the property owners/property managers. Decisions to make direct payment to the renter Household is at the discretion of the Program. The decision to make payments directly to the renter Household is deemed necessary if payment will help the household achieve housing stability. This may include payments made to prevent or mitigate eviction, especially in instances where time is of the essence.

Section 5.1 Determining and Documenting Payee Eligibility

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

- Property owner/property manager or leasing agent for a rental unit
- Utility company
- Manufactured home park owner/manager
- Directly to the renter household if the property owner/property manager will not cooperate with the Program or at the discretion of the Program, so the Household can make the payment directly

Section 5.2 Payments

(a) Payments to Property Owners/Property Managers

Payments to property owners/property managers may be paid following a payee validation process to confirm the property owner/property manager is the correct payee for the renter Household.

NOTE: Property owners/property managers may be paid via Automated Clearing House (ACH) or by a mailed check.

Property owners/property managers will be required to provide a W-9 and will receive an IRS form 1099. No IRS form 1099 will be sent to renters when payments are made directly to the renter.

(b) 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.

(c) Payments to Households

Minnesota Housing will make reasonable efforts to obtain the cooperation of property owners/property managers, 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 to the property owner/property manager or utility provider, and the addressee does not respond to the request within seven calendar days from postmark date; or
- The Processing Agent has made at least three attempts by telephone, text or system-generated communication over a 10-day calendar period to request the property owner/property manager's participation; or
- The property owner/property manager confirms in writing that the property owner/property manager does not wish to participate or will not provide required documentation, or
- The Program determines that a direct payment is the best outcome given an applicant's unique circumstances.

Payments to renters will be made directly to the Households via check mailed to the renter Household address on file. Payments to renter Households are solely for approved eligible expenses so that the renter Household can make the payment directly to the property owner/property manager. Payments should be made as soon as possible after receipt of the check.

It is advisable to promptly cash checks upon receipt to help ensure timely processing and access to funds. Waiting beyond 90 days to cash a check may result in potential difficulties, such as check expiration. To avoid any inconveniences or complications, it is recommended to promptly deposit or cash checks upon receipt. Check cancelation and re-issuance will be assessed by Minnesota Housing on a case-by-case basis.

Chapter 6. Data and Reporting

Section 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 that the privacy of individuals and Households is protected through secure data storage of personally identifiable information in locations accessible only to staff who need that information to perform their duties related to the Program. Additional confidentiality protections are implemented for data collected pertaining to any individuals who are survivors of intimate partner violence, sexual assault or stalking. Private data will be further limited and redacted as needed.

Section 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.

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

- Address of the rental unit
- Name, address, Social Security number, tax identification number or DUNS number, as applicable, for the property owner/property manager and/or utility provider
- Amount and percentage of monthly rent covered by the Program provided to each renter household
- Amount and percentage of separately stated utility and home energy costs covered by the Program provided to each renter Household
- Total amount of each type of assistance (for example, prospective rent, rental arrears, utilities and home energy costs, utilities and home energy costs arrears) provided to each renter Household

- Amount of outstanding rental arrears for each renter Household
- Number of months of rental payments and number of months of utility or home energy cost payments for which Program assistance is provided to each renter Household
- Household income and number of individuals in the renter Household
- Gender, race and ethnicity for the primary applicant for RentHelpMN Targeted Assistance

Minnesota Housing will maintain sufficient documentation of administrative expenses to demonstrate those expenses are within 15% of the total ERA 2 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.

Section 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.

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:
 - o 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 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 request 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
- Payments made directly to a renter Household
- Payments in final review (including fiscal correction, pending property owner/property manager acceptance and verification of payee)
- Payments approved
- Payments in process or those that are submitted for funding, and those pending a batch payment and comparable statuses, as Minnesota Housing has determined to pay those applications, which are subject only to final logistical steps

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 (Treasury's website (<a href="https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/emergency-rental-assistance-program).

Chapter 7. Fair Housing and Title VI Policy

Section 7.1 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.

Section 7.2 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 and navigators are expected to comply with the applicable statutes, regulations, and related policy guidance. Housing providers and navigators 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;
- Refuse to grant a reasonable accommodation or a reasonable modification to a person with a disability;

- 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

Section 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.

Section 8.2 Misuse of Funds

An entity or Household that receives funds through the Program must use those funds for the intended use and must 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, service provider, 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 must immediately make a report through one of the ways described in Section 8.05.

Section 8.3 Conflict of Interest

This section applies only to contractors, HSS Providers 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.

(a) 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. Section 200.112. Such information may also be reported to the U.S. Department of Treasury by Minnesota Housing.

Under the federal standard, no contractor, HSS Provider or other entity 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.

(b) 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.

Section 8.4 Suspension

This section applies only to contractors and HSS Providers. 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 (https://www.mnhousing.gov) for a list of suspended individuals and organizations.

Section 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 <u>Servant Leadership Team</u> (https://www.mnhousing.gov/about-us.html)
- Report Wrongdoing or Concerns (https://www.mnhousing.gov/report-wrongdoing-or-concerns.html)

Appendix A. Defined Terms

Terms	Definition	
Applicant	A Household or renter Household that has initiated or submitted an application for RentHelpMN – Targeted Assistance	
Automated Clearing House (ACH)	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 respectively (https://www.huduser.gov/portal/datasets/il.html)	
Common Household Application Portal	Online application and reporting system Minnesota Housing has contracted with Allita360 to develop	
COVID-19 Emergency Rental Assistance 2 (ERA 2) Program	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.	
Fair Market Rents (FMRs)	Used to determine payment standard amounts or rent ceiling for many federal housing programs. (https://www.huduser.gov/portal/datasets/fmr.html)	
Household	All adults and children living in the same home 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.	
Housing Stability Service (HSS) Providers	Service organizations under contract with Minnesota Housing to provide housing navigation and eviction prevention services through the ERA 2 program	
Minnesota Housing	The state's housing finance agency; also referred to as Minnesota Housing Finance Agency or Agency	
Minor	An individual age 17 or younger	
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 RentHelpMN – Targeted Assistance program	
Program	COVID-19 Emergency Rental Assistance 2 (ERA 2) Program, also known as RentHelpMN – Targeted Assistance	

Terms	Definition
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 United States Department of the Treasury