

# COVID-19 Housing Assistance Program Frequently Asked Questions

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The information in this Frequently Asked Questions is intended for potential grant administrators that will process housing assistance applications from households through the COVID-19 Housing Assistance Program. Please check back for updates as new information is available, questions are added, and answers are updated. If a new question is added or an answer is updated, it will be marked as new or updated.

If you are a household seeking assistance or information on when you can apply for housing assistance once the program is available, please visit this webpage.

## **RFP/Administrator Application Questions**

**Question:** What are the details/preferences related to organizations setting geographic boundaries for their services? Will groups with larger geographic areas be given a preference?

**Answer:** Preference is not given for larger geographies. For the RFP application, geographic service areas must be defined by the following:

- One or more counties
- One or more Minnesota Indian Reservations
- Cities of over 20,000 people
- Cities with defined city council wards/districts if over 85,000 people (Minneapolis, St Paul, Rochester, Bloomington, and Duluth)
- Statewide

It is a program priority to achieve statewide coverage when selecting grant administrators, and Minnesota Housing may ask program administrators to consider extending their geographic service area to ensure this resource is available throughout the state.

**Question:** We are planning to apply and know of another organization that is applying that will serve the same geographic area. How should we work together and will this duplication diminish our chances of being funded?

**Answer:** Potential applicants within the same service area are encouraged but are not required to work together. If two or more organizations choose to submit a joint application, the application should describe how the programs would coordinate and provide services. Joint applications should describe the partnership in the application. If you choose to submit separate applications, it will be helpful to describe how your approach may be different and works to meet the program goals.

**Question:** Is there data or information that an organization can access to plan for the amount of funding we should apply for?

**Answer:** Data to help guide planning is now available on our website <u>here</u>. The information provided is meant to give applicants a sense of the potential need and scale, but should not limit how much an applicant applies for.

**Question:** Are organizations allowed to apply to administer a subset of eligible uses, such as only providing mortgage assistance?

**Answer:** Organizations are encouraged, but will not be required, to provide the full coverage of eligible housing assistance identified in the RFP. The coverage of assistance offered by the applicant will be considered when evaluating the applications.

**Question:** Would each partner organization need to complete an RFP at the start of the application process (assuming all partners know who they are going to partner with already), or would one complete the RFP and all partners be listed on that one RFP?

**Answer:** If organizations are partnering, they should submit a single RFP together. Please be sure to identify the partners, the nature of the partnership, and the benefits of the partnership.

**Question:** Will funds be given proportionately to geographical areas based on population? If so, will areas with larger populations have multiple organizations that receive funds? Or will all funds go to one grantee (county social services for example) with subgrantees (ex: nonprofits)?

**Answer:** In addition to the application score, the review committee will evaluate geographic coverage, types of assistance provided and the community needs likely based on COVID unemployment, poverty and severely cost-burdened households. Funding decisions will not solely be based on geography or population.

While applicants do have the option to submit an application that includes subgrantees and provides full geographical coverage, such as a county or city, this does not preclude other agencies in that service area from applying independently, and other considerations will be taken into account when making funding decisions. If you are considering including one or more subgrantees on our application, please keep in mind the timing of the program and if your organization is subject to any other rules that may require a competitive RFP for subgrantees.

**Question:** If we are a city that does not have a local housing program, can we partner with a local nonprofit who does have experience?

**Answer:** Yes, a city could apply in partnership with another eligible organization.

**Question:** Is there any funding preference for non-entitlement counties? Or deduction for entitlement counties?

Answer: No.

Question: Is there a maximum amount that an organization can apply for?

Answer: No.

#### Added 7-21-2020 - New Question

**Question:** IRS Form 990 and Aging Schedule - can you provide clarification on what the Aging Schedule is?

**Answer:** The Aging Schedule is a schedule listing the trade receivables and trade payables on the organization's balance sheet that would list the vendor and number of days outstanding.

## **Program Administration Questions**

**Question:** Is there a guidebook for the COVID-19 Housing Assistance Program?

**Answer:** There is not currently a guidebook. The collective information on the <u>RFP website</u> provides the guidance for this program.

**Question:** Will there be one point of entry for individuals to get referred to local administrators? **Answer:** To help streamline information for individuals and families seeking assistance and to help support the selected administrators, Minnesota Housing is working to secure a statewide intake system. The anticipated process with a statewide intake system is that individuals and families seeking assistance will have a single phone number and website to contact to help evaluate initial eligibility and identify the selected grant administrator in their area. The households contact and initial eligibility information will be shared with the applicable administrator for follow-up and further processing. More information will be provided as available.

**Question:** Will there be a common assessment form that households will use to apply for assistance? **Answer:** Yes. Minnesota Housing will be providing a common template for all households to apply for assistance.

**Question:** Will we have to enter data in the Homeless Management Information System (HMIS)? **Answer:** No. Grantees will, however, be required to submit regular reports to Minnesota Housing in a manner and frequency established by the agency.

**Question:** Will we have to use the Minnesota Prevention Assessment Tool?

Answer: No.

**Question:** Can households apply through any approved administrator or do they have to apply to an administrator approved for a specific geographic area?

**Answer:** Households will need to apply to the administrator for their geographic area. A program priority is to provide statewide coverage. If there are gaps in statewide coverage, Minnesota Housing will work with grant administrators to expand coverage outside of the service area provided in their application.

**Question:** Will the payments be made in advance or will there be advance dollars available? **Answer:** It is anticipated that administrators will receive some advance funds after the grant contracts are executed.

**Question:** What happens in the case that not all the funds are spent?

**Answer:** These are time limited resources under the CARES Act. As a result, Minnesota Housing will be monitoring the use of funds carefully and may establish deadlines or other benchmarks for usage and may reallocate funds if needed.

**Question:** Will administrative costs be paid at beginning of the grant or at each draw? **Answer:** It is anticipated that a portion of the administrative costs will be paid with the first disbursement and then pro-rated with subsequent disbursements.

**Question:** Can we be both the main applicant on a proposal and also be listed as a partner/subgrantee on other applications? Depending upon the funding decisions, we would determine what is the most effective/efficient way to support our target community.

**Answer:** The RFP does not set limits on the roles organizations may play as grantees and/or subgrantees. However, if an organization is listed as a grantee or subgrantee on more than one application, this should be addressed in the application narrative, including the organization's justification for their multiple roles. If the organization is included and selected on more than one grant application, they must be prepared to provide services on both applications.

#### Added 7-21-2020 - New Question

**Question:** Is it recommended that we submit letters of support for our proposal? Where would we do that in the portal?

**Answer:** Letters of support are not required. You can describe support from partners or constituents within your application narrative.

## **Household Eligibility Questions**

**Question:** Are the income limits statewide or do they differ by county?

**Answer:** The income limits are the same throughout the state and are based on <u>the federal poverty</u> <u>guidelines</u> as calculated by the United States Department of Health and Human Services.

**Question:** Would forms of non-cash support for personal needs (medical reimbursement, transportation passes, etc.) be considered in calculating personal income? Or would only funds able to be used to pay rent, utilities, etc. be considered?

**Answer:** When calculating income to determine eligibility, only cash income is included. Non-cash benefits such as medical assistance or food stamps, or items such as transportation passes, are not considered income. Additional information on income calculations is forthcoming.

**Question:** Do tribal per-cap payments, tribal stimulus payments, or other stimulus payments (federal, etc.) count toward income?

**Answer:** One-time federal stimulus payments provided by the CARES Act do not count toward income calculations. Additional information on income calculations is forthcoming.

Question: Will applicants need to submit income documentation?

**Answer:** Yes. Applicants will need to submit documentation of gross income for the most recent time period, which may include:

- Pay stubs
- Documentation of cash assistance such as Social Security income or public assistance
- Documentation of unemployment compensation, worker's compensation or severance pay
- Documentation of child support, alimony or foster care payments
- If a household is without income, obtaining a signed, self-certification of zero income is required

In limited circumstances, individuals may be able to meet this requirement via a self-certification (template to be provided by Minnesota Housing). Additional information on income calculations is forthcoming.

**Question**: Can you clarify the timeframe for which will need to be to determine income eligibility? **Answer**: Applicants should attempt to obtain documentation of the household's income for the month prior to the date the household is seeking assistance. For earned income, this generally requires a minimum of two pay stubs.

If the household does not have or is unable to provide income documentation after three business days from intake, or if providing this documentation poses a hardship on the household due to geographic distance or lack of technology, third-party verification is allowed.

## Third-Party Verification

Under this form of verification, a third party is contacted to provide information about the household's income.

To obtain third party verification, the provider must obtain a signed release of information. Written verification is preferred; however, there may be times where the third party is unwilling to provide this and/or do so in a timely manner. In these instances, verbal verification is acceptable; however, this must be well documented in the client file, such as on intake paperwork or a case note. Information included should be the date the verbal verification was provided, the name of the individual providing the information and the entity they represent, as well as their contact information.

**Question:** Will households need to provide documentation that they are impacted by COVID-19? **Answer:** When applying for assistance, households will need to show that they are unable to make the payments owed because of a COVID-19 related issue such as unemployment or illness. In limited circumstances, they may be able to meet this requirement via a self-certification (template to be provided by Minnesota Housing).

**Question:** Can administrators limit assistance to their existing client base or to a targeted population? **Answer:** If selected for funding, administrators are required to establish a full and open application process that serves the entire geographic service area defined in their application. Administrators may conduct targeted outreach to reach disparately impacted populations.

**Question:** Can administrators prioritize assistance or target funds based on criteria not listed as eligibility criteria?

**Answer:** No. Administrators are not permitted to be more restrictive or add additional criteria.

### Added 7-21-2020 - New Question

**Question**: Can Minnesota Tribes specifically serve tribal members/American Indian households, or would they need to serve any household in the geographic area?

**Answer**: Administrators must comply with all applicable fair housing laws and requirements and must have a full and open application process to serve households throughout the geographic area. Tribal Nations may limit to tribal members only in areas where the Tribe has sovereignty/civil jurisdiction.

#### Added 7-21-2020 - New Question

**Question:** If no other requirements are allowed, how are we able to target certain populations, such as below 200% poverty or Native Americans?

**Answer:** While additional restrictions are not permitted and grant administrators must have a process

that accepts all eligible applicants, grant administrators may conduct targeted outreach to encourage household applications.

**Question:** Are landlords eligible to apply for the funds on behalf of their renters or apply for mortgage assistance for their rental units whose renters were impacted by COVID?

**Answer:** Landlords/property owners are not eligible to apply. Landlords may refer tenants to the grant administrators to encourage an application.

**Question:** Are the funds limited to one instance of assistance per household or can the same household apply multiple times?

**Answer:** Subject to funding availability, it is possible that a household could apply and be assisted more than one time as long as they continue to meet the eligibility criteria and have eligible expenses.

**Question:** Do we have the limit on the amount that we can support per household? **Answer:** At this time, there are not caps per household.

**Question:** Are there restrictions on eligibility for households who are already receiving other types of housing assistance (e.g., federal or other rental subsidy)?

**Answer:** Households receiving tenant-based or project-based assistance are generally not eligible for additional housing assistance through this program. Exceptions may be made for unique situations as determined by Minnesota Housing.

**Question:** Will you require the administrator to pull an applicant's credit report or tenant report? **Answer:** No.

**Question:** Is an administrator required to ask or verify any additional information regarding the household applicant?

**Answer:** To qualify for this program, an applicant will need to verify that they have past due rent, mortgage or other housing expense that they cannot pay due to the public health emergency of COVID-19; and second, the individual or household meets the income requirements. The applicant must also be a Minnesota resident.

#### Added 7-21-2020 - New Question

**Question**: Could receipt of this housing assistance negatively affect individuals in a future Public Charge analysis, such as in their application for citizenship?

**Answer**: It is our understanding that participating in this emergency assistance program should not count as a public benefit for purposes of the Public Charge rule. For more information on the Public Charge rule or if individuals have questions regarding their specific situation, the following may be useful: https://www.ilcm.org/immigration-resources/public-charge/.

#### Added 7-21-2020 - New Question

**Question:** Will administrators be required to create their own applications, or is Minnesota Housing providing all necessary forms?

**Answer**: Minnesota Housing will be providing a client intake template for all providers to use with their clients. We are exploring the ability to have the client intake form hosted online on a centralized website. Additional information will be provided at the time of award.

**Question**: We are proposing utilizing current FHPAP subgrantees and other new agencies to process cash assistance applications. Does each agency need to have a separate budget? Or could we have a flex fund that subgrantees access?

**Answer:** Minnesota Housing will require grantee budgets only, and that budget should include any subgrantee budget amounts, if applicable. Subgrantees must be able to directly report information to the grantee who will in turn report to Minnesota Housing.

## **Eligible Expenses Questions**

**Question:** Can assistance pay for homeowner's property taxes?

**Answer:** In general, property tax payments would not be an eligible use of funds, but exceptions may be made by grantees in cases of foreclosure prevention.

**Question:** Can a lender or jurisdiction that provided assistance to an individual impacted by COVID-19 be reimbursed by this program?

**Answer:** No. COVID-19 Housing Assistance Program funds are intended to provide assistance to households with past due housing bills. Payments to reimburse assistance provided by third parties are not an eligible expense.

Question: Could we help households with a security deposit for a new unit?

**Answer:** No. The COVID-19 Housing Assistance Program provides resources for past due eligible housing expenses. For other housing resources, please visit <a href="here">here</a> or contact your local <a href="FHPAP">FHPAP</a> Administrator.

**Question:** Are car payments, car insurance payments, or cell phone bills an eligible expense?

Answer: No.

#### Added 7-21-2020 - New Question

**Question:** If we were an administrator, can we assist a household who works in the geographic area we list on our MHFA administrator application but who doesn't live there? Or has no connection to our geographic area but hears we are an administrator?

**Answer:** Generally, households should be served by the administrator that serves the geographic region in which the household lists its place of residence.

#### Added 7-21-2020 - New Question

**Question:** Are second mortgage(s), other subordinate liens, or non-homestead/second/investment homes eligible?

**Answer:** If a second mortgage has a required payment and is past due, it would be an eligible expense. Non-homestead, second homes, and investment homes are not eligible.

#### Added 7-21-2020 - New Question

**Question:** For mortgages covered under the CARES Act, do you require that homeowners with mortgages try to obtain special forbearance, loan modification, and/or repayment plan?

**Answer:** Yes

Question: For mortgages NOT covered under the CARES Act, do you require that homeowners with

mortgages try to obtain special forbearance, loan modification, and/or repayment plan?

Answer: No

#### Added 7-21-2020 - New Question

**Question:** How do I know if I have mortgage relief options covered by the CARES Act?

**Answer:** Information can be found at <a href="https://www.consumerfinance.gov/coronavirus/mortgage-and-decomposition">https://www.consumerfinance.gov/coronavirus/mortgage-and-decomposition</a> the state of the st

housing-assistance/mortgage-relief/

Additional questions and answers will be posted on Minnesota Housing's website at <a href="https://www.mnhousing.gov">www.mnhousing.gov</a> as they become available.