



ERA2

Housing Stability Services Program (HSS)

Day 2 –

Client Eligibility and Allowable
Expenses

March 30, 2022

Housekeeping

- All material available at <https://www.tdhca.state.tx.us/HSS.htm>
- Dedicated Q&A session at the end of the training
- Please send questions throughout the presentation via the questions box
- Training will be recorded and posted on our webpage



Agenda

- Household Eligibility
- Income Determination
- Client Intake, Duplication of Benefits, and Length of Assistance
- Programmatic Expenses
 - Eligible vs. Ineligible Programmatic Expenses
 - Eligible Expenses FAQ
- Administrative Expenses
- Q&A time



Household Eligibility and Client Intake Overview

Household Eligibility Requirements



FINANCIAL
HARDSHIP



HOUSING
INSTABILITY



INCOME
ELIGIBILITY



INCOME
VERIFICATION



NO DUPLICATION
OF BENEFITS



ERA 2 HSS Household Eligibility

- One or more individuals within the household has qualified for unemployment benefits or experienced a reduction in household income, incurred significant costs, or experienced other financial hardship due to **or during** the COVID-19 outbreak; and
- One or more individuals within the household can demonstrate a risk of experiencing homelessness or housing instability; and the household has a household income at or below 80 percent of area median income.
- U.S. Citizenship is not required for a household to be eligible for ERA2 services

Income Determination: Self-Attestation

- Self-attestation of household income without further verification as to household income is sufficient for determining income eligibility for Housing Stability Services under ERA2.
- Self-attestation from a household must specify the monthly or annual income claimed by the household and be certified by a caseworker, housing navigator, or other housing stability service professional. The subrecipient must reassess the household's income every three months.
- In appropriate cases, Subrecipients may rely on an attestation directly from a housing stability service professional with knowledge of a household's circumstances to certify that an applicant's household income qualifies for assistance.
- Households may need to provide income documentation upon request.

Household Self-Attestation

All Households must attest to all 4 qualifying conditions:

1. Income at or below 80% AMI
2. Housing Instability
3. ERA 2: Financial Hardship due, directly or indirectly, to the COVID-19 pandemic

ERA 2: Financial Hardship during or due, directly or indirectly, to the pandemic.

4. No duplication of ERA2 HSS benefits

Exceptions to Completing the Household Self-Attestation (Subrecipient must reflect in the file which exception applies):

Household cannot certify due to:

- Disability that prevents completing the form;
- Extenuating circumstances related to the pandemic such as being literally homeless; or,
- A lack of technological access (where the Subrecipient accepts applications virtually).

Housing Professional Certification

Housing Professional **HAS** knowledge of household circumstances and can certify that the Household meets all qualifying conditions.

Housing Professional **DOES NOT HAVE** knowledge of a household circumstances and must request further documentation to determine qualifying conditions including income eligibility using one of the following three options:
Option 1 Categorical Eligibility
Option 2 IRS 2021 Income
Option 3 Monthly Income

Eligibility

Household is eligible to receive HSS assistance without further providing income documentation

Income eligible: Household is eligible to receive HSS assistance

If income source documentation cannot be obtained within a reasonable timeframe then Subrecipient should note in file and may serve Household citing self-attestation.

Over income: Household is not eligible to receive HSS assistance and a denial letter is issued.

Re-Certification

Re-certify using Self-Attestation and/or Housing Prof. Certification every 3 months or determine income eligibility with Options 1, 2, or 3

No recertification necessary when income eligibility is determined.

Re-certify using Self-Attestation and/or Housing Prof. Certification every 3 months or determine income eligibility with Options 1, 2, or 3

Client Intake



➤ Sample Client Intake Form:

<https://www.tdhca.state.tx.us/pdf/covid19/hss/HSS-IntakeChecklist.docx>

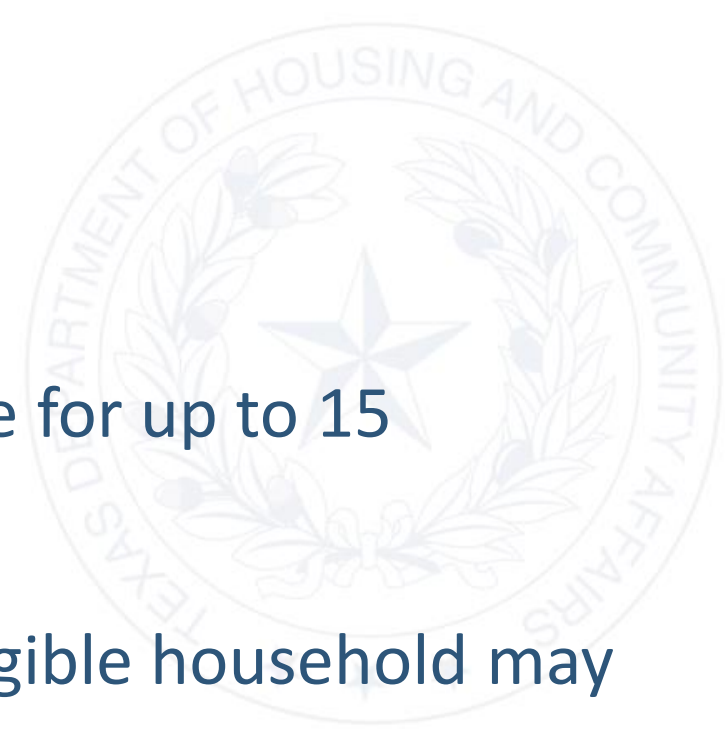
- The Sample Client Intake Form is available as a template for subrecipients to change to organization's needs
- Client intake should include all eligibility criteria and required reporting requirements, to be discussed in Reporting Training on 03/31

Duplication of Benefits



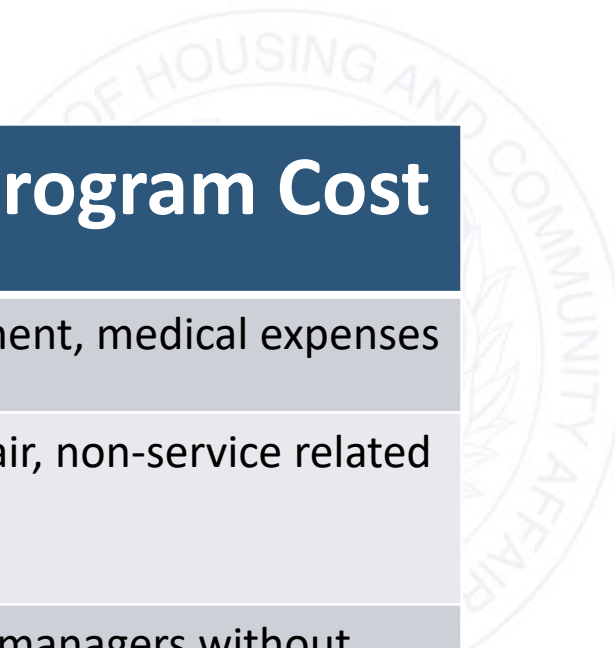
- Households must certify that they are not receiving duplicated TDHCA Housing Stability Services from another organization.
- This includes households working with the Texas Homeless Network (THN) on Emergency Housing Voucher Administration
- For organizations funded for legal aid outside of the TAJF Program, please ensure households do not receive a duplication of benefits from multiple organizations
- This does not include households receiving rental assistance or utility assistance through ERA2 or other programs.

Length of Assistance



- Households may receive housing stability assistance for up to 15 months for ERA2.
- The aggregate amount of financial assistance an eligible household may receive under ERA2, when combined with financial assistance under ERA1, must not exceed 18 months.

Programmatic Expenses Overview



Allowable Program Cost	Not Allowable Program Cost
Therapy, mental health services	Prescriptions, medical equipment, medical expenses
Transportation for clients or staff to provide services including: cab fare, gas reimbursement, Uber, Lyft, or bus fare	Vehicle purchase, vehicle repair, non-service related travel expenses
Client-facing program staff, case workers, housing navigators	Administrative staff, program managers without client interaction, kitchen staff, janitorial staff (admin)
Purchase of a computer or broadband assistance to help a program participant attend an HSS training program, search for employment, or communicate with a remote medical provider	Purchase of computers, broadband internet, or phone service for general program use and/or administration (admin)
Rental deposits, pet deposits, utility deposits, landlord incentives, and utility reconnection fees	General rental assistance or utility assistance.
Shelter outreach and landlord outreach so long as these activities directly serve eligible households	General marketing, outreach, and public affairs expenses that don't directly serve eligible households (admin)

The program costs detailed above are examples and are not an exhaustive list.

Direct Household Payments: Rental, Utility, or Pet Deposits, Short-Term Payments for Hotels or Motels, and Landlord Incentives

- Deposits must not exceed 1 month's rent in value
 - Subrecipient may request a rental deposit totaling two months rent if it is customary in local rental market
 - TDHCA staff will review request and provide written approval
- Utility Reconnection fees are an eligible expense Pet deposits should not exceed \$500 per pet or \$1000 for all pets.
- ERA2 funds cannot match ESG funds, but may be used as match for HOME or AmeriCorps funds if spent on eligible matching items for those programs.

Direct Household Payments: Landlord Incentives

- Subrecipients are required to document incentive payments and/or security deposit in lease agreement
 - Landlord incentives must not exceed 1 month's rent
 - Keep lease agreement for your client files
 - Lease must be at least 6 months in length



Program Expenses: Gift Cards

- Gift cards are an eligible expense so long as they are used to purchase eligible food, basic clothing and hygiene items for eligible households
- The subrecipient is required to keep receipts for eligible purchases
 - Restaurants, food co-ops, or resale clothing store that only sell eligible items may be exempt from receipt tracking if outlined in org's gift card policy
 - Box stores or grocery stores, such as HEB, require receipts to be tracked
 - Must document gift card use in client file
- Must have written policy and controls regarding gift card use that is compliant with 2 CFR Part 200.
- Gift card fees count as administrative expenses

Program Expenses: Technology Costs

- Broadband assistance, phone minutes, or purchase of a computer or phone is allowed ONLY if directly necessary to obtain or maintain housing
- No individual purchase of equipment of \$5,000 or more is allowed and purchases must be reasonable given the services provided and client needs

Program Expenses: Childcare Expenses

- Childcare expenses are eligible if your client is otherwise eligible for assistance AND they are searching for a new job so that they can maintain or obtain housing
- Childcare expenses may extend two months beyond the start of the new job to ensure stability within the new role

Administrative Expenses

Overview

Administrative Expenses

- **Administrative Budget:** Subrecipients can incur the following administrative costs to deliver the home stability services program:
 - salaries and related costs
 - supplies, overhead (utilities, maintenance, etc.)
 - equipment (with Department approval)
 - transportation, and mileage for administrative functions
- Funds requested for administration are limited up to **10 percent** of the total amount of funds requested.



Q&A Time

Thank you!

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