Strategy: Supporting Households Experiencing Homelessness Post-Disaster through a Tenant Rental Assistance Approach

As rental costs typically increase post disaster and the number of households needing financial housing assistance surges, communities have successfully used a tenant-based strategy to re-house and stabilize individual households so they can afford housing costs of market-rate units. For such programs to be accessible and responsive to people experiencing homelessness, the jurisdiction must undertake a comprehensive strategy to increase the number of programs that provide tenant-based housing subsidies, herein referred to as tenant assistance programs, that include direct financial assistance as well as housing identification and case management.

WHAT ARE TENANT RENTAL ASSISTANCE PROGRAMS?

Tenant assistance programs can provide a short-, medium-, or long-term financial subsidy that eligible jurisdictions can use to help households afford rent. Typically, they provide payments to make up the difference between the amount a household can afford for housing and local rent standards and can include an option to assist tenants with utility costs and security deposits. In some cases, a program may also provide supportive services such as, but not limited to, case management and housing navigation services, tailored to the needs of the individual household. This funding summary has a detailed list of federal resources that can fund tenant rental assistance programs post-disaster and their eligible uses.

Tenant assistance programs offer flexibility that make it especially useful for helping homeless households because:

- Assistance is provided on behalf of individual households and is not tied to specific properties or units, making it easier to target towards homeless households.
- Assistance moves with the tenant. The household may take the assistance and move to another rental property as their circumstances change.
- Direct subsidy amount is adjusted to household income. The subsidy is typically based upon the income of the household, the particular unit the household selects, and the local rent standard.
WHAT ARE THE CORE COMPONENTS OF A TENANT RENTAL ASSISTANCE PROGRAM DESIGNED TO ASSIST PEOPLE EXPERIENCING HOMELESSNESS POST DISASTER?

Post disaster, a rapid response that combines housing with services can be effective in supporting people experiencing or at risk of homelessness. The rapid re-housing (RRH) model provides useful guidance. HUD defines rapid re-housing as an intervention, informed by a Housing First approach that is a critical part of a community’s effective homeless crisis response system. Rapid re-housing rapidly connects families and individuals experiencing homelessness to permanent housing through a tailored package of assistance that may include the use of time-limited financial assistance and targeted supportive services. HUD’s Continuum of Care (CoC) and the Emergency Solutions Grant (ESG) programs include rapid re-housing as an eligible form of assistance and give communities flexibility to tailor these programs to local circumstances.

Borrowing from the rapid re-housing model, recommended core program components of a post-disaster tenant assistance program include:

- **Housing Identification**: Helps households find appropriate and safe housing and address barriers to that housing. This can involve the recruitment of landlords as well as identification of individual housing opportunities, such as co-housing or moving in with family members.

- **Rent and Move-In Assistance**: Provides financial assistance to cover eligible move-in costs, deposits, and rent and utility costs to eliminate financial barriers to signing a lease.

- **Case Management and Services**: Case management and supportive services to help individuals and families select among permanent housing options, address financial issues, negotiate manageable lease agreements, make time-limited services available, and monitor housing stability. Case management often involves interactions with participants and landlords. The pairing of guaranteed rent with an agency’s supportive services and case management can be a strong selling point for landlords who might otherwise not rent to tenants who have experienced homelessness, or who have other barriers.

- **Time-limited subsidy in permanent housing setting**: Provides short- and/or medium-term financial assistance allowing more households to be served than traditional permanent housing programs with

HUD drafted a Rapid Re-Housing Policy Brief that provides an overview of the core components and practice considerations of the rapid re-housing model. USICH has a number of featured tools and resources on rapid re-housing. The National Alliance to End Homelessness has a Rapid Re-housing resource page that provides information on policy, training, and relevant research for practitioners.
no limit on length of stay. While some persons seeking assistance will need a long-term subsidy, this will not be required for all households. A rapid re-housing model provides an important tool to communities to help homeless households get quickly back on their feet.

This [step-by-step guide](https://www.hudexchange.info/homelessness-assistance/disaster-recovery-homelessness-toolkit/recovery-guide/) has detailed information to launch a tenant rental assistance program based on these core components.

**WHAT DESIGN AND IMPLEMENTATION CONSIDERATIONS ARE CRITICAL TO PROGRAM SUCCESS?**

As you design a post-disaster tenant assistance program, you should not need to start from scratch. Instead, you can design your tenant assistance program expanding upon programs already in place. The CoC will have experience administering tenant-based rental assistance in both permanent supportive housing and rapid re-housing models. Further, an entity – the local public housing agency (PHA) running Housing Choice Vouchers or the local jurisdiction running a HOME TBRA – also has substantial implementation experience, processes, and procedures for administering tenant-based financial subsidies. The first step in the process should be to bring representatives with relevant experience from the CoC, the PHA, and other local agencies to design the program together to find out what is already in place and discuss possible design considerations. These considerations may include:

- **Rapid identification of vacant units.** Communities will want to leverage established relationships with landlords. This provides an opportunity for stakeholders to share information as well as identify new landlord participants through active outreach. Developing relationships with landlord associations or through a [Landlord Liaison Project](https://www.hudexchange.info/homelessness-assistance/disaster-recovery-homelessness-toolkit/recovery-guide/) can increase the availability of, and access to, rental units. See a [sample email](https://www.hudexchange.info/homelessness-assistance/disaster-recovery-homelessness-toolkit/recovery-guide/) that can be used for outreach.

- **Increasing Staff Capacity.** Additional staffing capacity will likely be needed, at least in the short term. Consider reaching out to neighboring communities not impacted by the disaster to see if they can identify staff that could come to your community to provide support on a short-term basis. Existing staff will likely need additional training and support to assist a greater number of homeless households following a disaster. Cross-training between CoC representatives and providers with local housing agencies and administrators will help increase long-term capacity.

- **Proactive use of data.** The CoC can use Homeless Management Information System (HMIS) data to quantify the needs of households experiencing homelessness and help design a responsive tenant assistance program. HMIS data can also be used to identify households that are nearing the end of their enrollment in a program and pursue strategies to help those households shift to appropriate new...
forms of assistance. This process can free up the unit or subsidy for newly identified households experiencing homelessness after a disaster.

- **Prioritization of households.** To make the most efficient use of resources following a disaster, a community will need to determine how homeless households that were further displaced by a disaster will be prioritized for assistance. Many communities prioritize households for assistance based on length of time homeless and an overall assessment of vulnerability or severity of service needs. You will need to work with stakeholders to come up with standards for how households will be prioritized for assistance.

- **Increased mobility options.** Taking rental assistance across jurisdictions may help households following a disaster find more appropriate housing that has not been damaged by the disaster, provides greater accessibility or affordability, or better meets the household’s needs and preferences. Homeless households receiving assistance with CoC Program-funded rapid re-housing and other tenant-based rental assistance may move outside of the CoC’s geographic area in order to expand their housing options. Although the CoC Program permits households to choose housing outside of the CoC’s geographic area, other rapid re-housing funding sources might not without requesting a waiver.

- **Removal of administrative barriers.** Although most CoC-funded homeless services providers are already using a housing first approach, many PHAs and other agencies responsible for administering financial assistance may have historically had certain requirements related to things like income or criminal history. In a post-recovery tenant assistance strategy, as many barriers should be eliminated as possible to ensure that homeless households are not screened out from receiving assistance. Similarly, where permitted by programmatic regulations, an individual with no employment records, identification, and/or housing records may need to self-certify their status. Consider using a self-certification form to identify homeless households in need of assistance.
Step-by-Step Guide: Stand-Up a Tenant Rental Assistance Program Post Disaster

Step 1. Articulate program parameters
To determine the size and scope of your program, consider the needs of the target population, the size and nature of the need, other resources available, and the pace of recovery. You should be able to specify:

- Number of people to be served
- Budgetary requirements for each core component of your program:
  - Direct rental assistance
  - Housing identification services
  - Case management and supportive services
- Length of time program is likely to be needed at full capacity. When evaluating this point, a jurisdiction may want to consider when additional market options will be viable. Market options may include PHA units coming back online, permanent supportive housing rehabilitated, and new construction as well as employment growth.

Step 2. Identify existing tenant rental assistance programs and potential funding sources
Look to your PHA and local agencies to find an entity with prior expertise in tenant rental assistance. Leverage their existing staff, systems, and funding to implement the program. As you assess funding options for expanding the existing program, consider the rules, regulations, and funding available for each potential source. Also consider the waiver authority that the federal government may have post disaster to allow for modifications to a program to meet post-disaster needs.

This funding summary provides a list of federal resources that can support tenant rental assistance programs post disaster. Assess the funding available to decide which source best fits your program needs. Consider:

- **Flexibility of program rules.** Some programs have more flexibility with regard to eligible applicants and timeframe for the program. Consider which sources best meet your program design. The Social Services Block Grant (SSBG), for example, allows a great deal of flexibility with regard to timeframe and eligibility.
• **Alternative uses of funds.** Some funding sources, such as CDBG-DR when available, allow for a broad range of services that may not be covered by other sources. Consider your investments in tenant rental assistance in the larger picture of your full program portfolio and consider sources that cannot be used for other activities.

• **Compatibility of funds.** If you select more than one funding source for your program, consider any potential conflicts in requirements. Work closely with your local HUD field office to make sure all requirements can be met if carried out as planned. As you implement the program, establish a clear delineation of record keeping, including financial processes, and application of regulations and policy.

**Step 3. Develop the program infrastructure**

To make tenant assistance programs responsive to people experiencing homelessness you will need to adapt to the realities of post-disaster rental markets and provide additional supports for vouchers to reach your intended audience. Specifically:

• **Create an inventory of available units.** Program participants will likely need assistance to find units in the tight post-disaster housing market. Monitor housing locator, local apartment registries, local housing authority, rosters, and the local multi-list service (such as [www.realtor.com](http://www.realtor.com)) to create an inventory of available units. Some of these inventories are refreshed frequently to provide updated availability. Strategies to engage with landlords and other operators of housing resources will vary by community based on housing market conditions, size and density of the community, and other factors. The [National Alliance to End Homelessness](http://nationalallianceendhomelessness.org) and the [United States Interagency Council on Homelessness](http://usich.usich.gov) (USICH) have developed resources for landlord outreach. See a [sample email](mailto:sample_email) that can be used for outreach.

  – **Mine your local Public Housing Authority or State Housing Finance Agencies lists.** Both of these agencies provide vouchers and likely maintain inventories of available units.
  
  – **Identify Housing locator services.** Many states have locator services that are maintained by the state housing finance agency or other local non-profit housing providers. If your area has been heavily impacted by the disaster, you may need to look for units in areas of less impact.
  
  – **Engage Housing Counseling Agencies.** Housing counseling agencies can provide assistance to identify potential rental units, case management services, and tenant workshops that help homeless households have a successful rental experience.

• **Expand the scope of the CoC’s coordinated entry process.** Each CoC is required to develop and implement a [coordinated entry process](http://www.coordinatedentry.org). Having all parties participating in coordinated entry will ensure...
that no matter where a household attempts to access housing and services, it will be referred to the program that is most appropriate for meeting its needs.

• **Establish traditional case management services.** Program participants are likely to need additional support beyond locating housing. Engage local service providers to work one-on-one with program participants to help them find and secure housing. Work with the CoC to determine what supportive services are already available within the community for persons experiencing homelessness.

  – **Identify tenant-specific support.** Assistance with health care, transportation, legal services, employment and other important services will improve housing stability. Support may include removal of financial barriers through rent and move in assistance as well as income stabilization through job training, educational programs, child care, and health services.

  – **Provide services to landlords.** Well-informed landlords are essential to tenant retention. Identify local housing assistance centers to provide education for landlords on the management, legal, and financial considerations associated with rental housing and serving tenants who receive TBRA.

• **Adopt program guidelines.** Adapt existing procedures and written policies as appropriate to accommodate the post-disaster program. See the [sample program guidelines](https://www.hudexchange.info/homelessness-assistance/disaster-recovery-homelessness-toolkit/recovery-guide/) for a tenant assistance program post-disaster that may be used to help set or adjust policy standards for your program.

• **Request waivers.** Some funding sources may require a waiver to standard program rules. For example, CDBG-DR requires a waiver to provide more than 3 months of TBRA assistance. It is important to remember that statutory requirements may not be waived.

• **Hire and train sufficient staff.** Even if you use an existing provider to implement the tenant assistance program, the short-term demands of a post-disaster program are likely to require additional staff. Take advantage of workforce investment programs and market job openings broadly to find new staff. Provide training and support as the program ramps up.
Sample Email: Landlord Outreach for Tenant Rental Assistance Program

The following sample email references specific elements optional in running a post-disaster Tenant Rental Assistance program. This email template should be adapted to local circumstances, program goals, and funding requirements.

Dear (Contact from apartment association, landlord group, or housing coalition),

Following the effects of (named storm/disaster event), our community is in need of safe, secure, and affordable housing to assist our most vulnerable friends and neighbors who were experiencing homelessness and were displaced by (named storm/disaster event). While it can feel like a risk to rent to a tenant with barriers to housing, the financial support and case management services provided by our community’s Tenant Rental Assistance Program ensures that tenants and landlords alike are supported by our participating agencies.

Here is how the Program works:

- Individuals and families who are experiencing homelessness are connected to a pre-screened Agency.
- The agency works with the individual or family to identify a unit that meets their needs.
- The agency supports the individual or family meet the landlord’s screening and eligibility requirements.
- Rental assistance is provided to the landlord to pay the rent for (xx) months, after which the tenant assumes full responsibility for paying rent.
- Supportive services and case management ensure that the household remains stable in housing.

In our area, the Tenant Rental Assistance Program provides rental assistance to individuals and families for use in renting safe, secure, and affordable apartment units. The rental assistance is typically based on the Fair Market Rent (FMR), which in our area is ($xxx) for a 2-bedroom unit. Providers that receive HUD funding through the (xx) Program can pay above FMR as long as the unit meets rent reasonableness. This provides additional flexibility to find a unit that meets the needs of the individual or family, and provides additional income to the landlord.

Some of the benefits to landlords are:

- **Guaranteed, on-time rent payments.** Both the tenant and the Agency provide rent to the landlord, ensuring consistency in payment of rent. Many agencies in our community use a three-party lease, which means that both the tenant and the Agency are parties on the lease and are responsible for...
specific portions of the rent that is due. This provides additional transparency to landlords to ensure that rental payments are paid on-time and in full.

- **Security and damage deposits.** Rental assistance through the Program can make an advance payment of the last month’s rent, plus first month’s rent and security deposit, to the landlord. The Program also allows for up to one month’s rent to be used to cover any property damages, and the agency can provide the landlord with up to one month’s rent for a vacancy payment so that the landlord does not need to go through the time and expense of marketing the unit if vacated before the end of the lease.

- **Backing of a partner agency.** Program managers and Agency staff provide direct connections to address concerns and barriers during the tenancy of the individual or family.

Additionally, Tenant Rental Assistance Programs can provide supportive services for up to (xx) months after rental assistance stops to ensure that the household remains stable in their housing and that the landlord’s needs are met.

During this time of crisis, finding safe and secure housing for our most vulnerable citizens is of paramount importance. Please consider partnering with our providers to help [city/county/jurisdiction] rebuild.

Sincerely,

(Program Director)
Sample Program Guidelines

POST-DISASTER TENANT-BASED RENTAL ASSISTANCE PROGRAM TO ADDRESS HOMELESSNESS

The following are sample program guidelines for a post-disaster TBRA program that is designed to prevent homelessness in the community. These guidelines are based on an actual CDBG-DR program and, therefore, include reference to a waiver to the three-month limitation on assistance¹ and other specific program components. These guidelines should be adapted to local circumstances, program goals, and funding requirements.

Special features in these guidelines, aimed at addressing homelessness, include the provision of housing location assistance and other supportive services to address and/or prevent continuing homelessness, eligibility requirements for people experiencing or at risk of homelessness per HUD’s definition of homelessness, and assistance period beyond the 3-month limitation on use of CDBG-DR funds.

1. PROGRAM DESCRIPTION

In response to the loss of affordable housing units due to the disaster, the State developed a program to provide tenant-based rental vouchers. The goal is to increase provision of affordable rental units to [very low, low, and moderate income] households. The program is part of the Supportive Services Program noted in the Action Plan under an activity designed to prevent homelessness among low and very low income residents in counties impacted by the disaster.

2. PROGRAM DESIGN

The TBRA Program follows all of the CDBG-DR requirements as well as all State policies.

2.1 PROGRAM ALLOCATION:

[Insert amount to be allocated for the program]

2.2 USE OF FUNDS:

Grant funds will provide temporary rental assistance residents of storm-impacted areas (pursuant to Federal Register Notice of allocation) who are experiencing homelessness or are at risk of becoming homeless. Those “at risk” of homelessness are further defined as persons living in unstable or overcrowded housing;

¹ CDBG and CDBG-DR regulations limit the duration of tenant based rental assistance to three months. To extend the program for longer periods, a waiver must be granted by HUD and published in the Federal Register. Some of the guidelines and timeframes in this sample are more reflective of a TBRA program that has received a 12- or 24-month waiver. For 3 month programs, some of the requirements can be reduced and the cohort of available units for 3 month rentals will be more limited.
those forced to move frequently due to economic hardship; and those with increased risk of homelessness as defined by the State’s Consolidated Plan. [See the self-certification for suggested eligibility form to be used with Intake Application.]

2.2.1 TERMS OF ASSISTANCE:
The TBRA voucher will be issued for a term [insert the timeframe permitted by the program funding source and/or your program design].

2.2.2 TENANT RENT:
The household will pay 30 percent of their adjusted income for their portion of the rent, minus the applicable utility allowance. The Program will subsidize the difference between the Tenant Rent and the Unit Rent. The unit rent may not exceed [X% of HUD’s FMR] for the county where the unit is located.

2.2.3 MAXIMUM ASSISTANCE:
Funding will provide up to [insert number of months. Keep in mind waiver requirements for CDBG-DR] months of rental assistance to approximately [# households]. Maximum amount of assistance to a household will not exceed [$XX].

2.2.4 OCCUPANCY STANDARDS:
The number of bedrooms needed by households of various sizes and composition:

<table>
<thead>
<tr>
<th>OCCUPANCY STANDARDS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bedroom</td>
</tr>
<tr>
<td>--------</td>
</tr>
<tr>
<td>0-bedroom</td>
</tr>
<tr>
<td>1-bedroom</td>
</tr>
<tr>
<td>2-bedroom</td>
</tr>
<tr>
<td>3-bedroom</td>
</tr>
<tr>
<td>4-bedroom</td>
</tr>
</tbody>
</table>

Exceptions to these standards may be considered because of the age, sex, health, handicap, relationship of household members or other individual circumstances.

2.2.5 PORTABILITY:
[Insert language to specify if approved units must be in the disaster area or can be in other areas.]

2.2.6 SET-ASIDE:
[Craft language to highlight specific set asides to meet program goals] This program serves households that are experiencing or are at risk of homelessness. To serve this need, eligible applicants will be [at or below XX% of Area Median income]. To ensure that the most vulnerable are served, the program includes a set aside [for XX households] at or below 30% of the Area Median Income.
2.3 TENANT ELIGIBILITY

2.3.1 ELIGIBLE HOUSEHOLDS
Eligible households:
- Qualify as homeless or at risk of homelessness [see self-certification]
- Have income at or below [XX%] of the Area Median Income as established by HUD
- Lived in one of the most impacted counties
- Were impacted by the disaster
- May have previously received rental housing assistance from FEMA and the rental subsidy or rental unit are no longer available
- Sign form certifying that they were displaced, suffered damage, or otherwise experienced financial distress related to housing which was a direct result of the declared disaster

2.3.2 UNITS
Tenants receiving TBRA assistance must use the rental assistance in units that are inspected prior to approval. The units must:
- Meet Section 8 Housing Quality Standards and, for units built prior to 1978, are in compliance with HUD’s Lead Safe Housing Rule (24 CFR Part 35);
- Rent for a reasonable amount, compared to rents charged for comparable units; and
- Not be receiving another form of rent subsidy

2.4 NATIONAL OBJECTIVE:
Low and moderate-income

2.5 PROGRAM ELIGIBILITY:
105(a) (8)/570.201(e) - Public Services to prevent homelessness among low income residents; FR 5696-N-01, HUD Waiver FR 5696-N-10, and HUD Waiver FR–5696–N–15.
(Note: These Federal Register notices provide guidance as to the language necessary to request an extension of the 3-month time limitation on tenant based rental assistance.)

2.6 LINKS TO SOCIAL SERVICES & PERMANENT HOUSING UNITS
To assist households to find permanent housing resources, enable the households to plan for the end of the TBRA period, and link to other needed social services, the program will refer all participants to housing counsellors or case managers as appropriate. Housing counselors and case managers will:
• Provide program participants with housing search assistance. They will use the state or local Housing Resource Center database to prioritize referrals to permanent affordable housing units created with CDBG-DR and other funds.
• Assess the participant’s need for other supportive services; including but not limited to employment and job training assistance, behavioral or physical health services, substance abuse treatment services, family counseling, or other services.
• Establish a mutually agreed upon plan to secure and follow through with these services will be determined.
• Meet with the participant on a regular basis during the period of TBRA assistance (suggest at least bi-monthly) to assess the progress toward the goals established in the plan.
• Work with the household to identify a permanent affordable housing unit so that, at the termination of TBRA assistance, the household will not become homeless.

Any applicant who does not receive a voucher will be referred to a housing counseling agency for assistance in locating affordable housing and for other social services referrals.

2.7 LEAD AGENCY

[Insert name of Agency administering the program.]

3. PROCESS

[It is suggested, although not required, that the Lead Agency implement the TBRA Program consistent with but not identical to its Housing Choice Voucher Program and will follow the policies and procedures that exist within the of jurisdiction’s Housing Choice Voucher Program’s Administrative Plan.]

3.1 OUTREACH

[Insert description of outreach activities to be undertaken. For example:]

To ensure that eligible participants are made aware of the assistance, the administering agency will conduct outreach to entities that provide programs and services including providers of FEMA emergency services, the local Continuum of Care, and Long-Term Recovery groups. In addition, the agency will provide program information at locations frequented by eligible program participants including, but not limited to, disaster shelters, emergency shelters, social services agencies, schools, medical facilities, and places of worship.

Outreach efforts will provide information regarding access to free housing counseling services in each of the impacted counties. Housing counselors will be available to assist applicants in applying for the program.
3.2 APPLICATION PROCESS

[Will vary based on Grantee’s program design.]

3.2.1 APPLICATION FORM
The application form will be provided in English and [list other languages appropriate to the area]. It will be posted on the agency’s website and distributed in hard copy at the locations listed above. Applications will be translated upon request in the event an applicant requires an application in a language other than Spanish. Assistance with the application process will be provided to any applicant upon request.

3.2.2 INTAKE:
[There are several options to process applications: a lottery is just one]
Intake forms (electronic or paper) will be accepted from _________ (date) to midnight on ______________ (date). All completed intake forms received by the deadline will be entered into a database and lottery system will be used to randomly select approximately ________ (approximate number to be funded) households. After all eligible household are processed, rolling applications will be accepted on a first-come, first-serve basis.

3.2.3 REVIEW OF APPLICATION, CALCULATION OF INCOME:
The program will send letter and application packet in English and Spanish to the applicants selected. For any applicant lacking an address provision will be made for them to come to a local site (municipal office or social services agency) to complete the application. Assistance will be provided at the site to assist them with this process.

Applicants will complete a paper application and return application and any necessary documentation to ______________ within _____ days. Staff reviews the application to determine the household’s income eligibility. At the same time staff orders and reviews a criminal background check on the applicant.

An applicant’s income eligibility will be verified and documented by staff. The required documentation for eligibility is [insert documentation requirement. Consider the self-certification as a model.]

If the applicant does not remit a completed application package within ________ days, the Program Manager sends a letter notifying the applicant that they did not comply with the requirements of the program and the applicant will be given ___ business days from the date of the letter to submit additional information and/or clarify any defects in the initial application.
Any applicant that is denied assistance has a right to appeal that decision. Appeals must be received within 15 days of notification that an application has been denied. All appeals received on time will be reviewed by the Administrator of the Housing Assistance Programs and a determination letter will be mailed out within 10 business days.

3.2.4 INELIGIBILITY
If an applicant completed the application but did not meet the criteria for the program, they are deemed ineligible. The Program Manager sends a letter to the applicant notifying the applicant that they are ineligible and providing them with an opportunity to file an appeal. The applicant will be given ___ business days from the date of the letter to file an appeal. All appeals received on time will be reviewed by the Administrator of the Housing Assistance Programs and a determination letter will be mailed out within ___ days.

3.2.5 SELECTION OF APPLICATIONS
Once the application cycle is closed and staff has reviewed all applicants for eligibility, the applicants are contacted and advised of next steps by staff.

[Add detail regarding what staff will assist and the assistance to be provided such as housing search. e.g., The applicant will be contacted by a case manager, advised of the maximum amount of rental assistance to be provided, and given suggestions of available units. If necessary, the social services case manager assigned to assist the applicant, can provide help in locating a suitable unit.]

3.3 AWARD OF TBRA

3.3.1 NOTIFY APPLICANT OF AWARD
The case manager schedules and conducts a briefing with the applicant; the subsidy is determined; and a voucher is issued.

3.3.2 CALCULATING THE TENANT SHARE
Staff calculates the tenant portion of rent using the following:

(Provided as example only. Grantee should specify method for determining tenant’s portion of the rent.)
Subsidy Calculations: The calculation of tenant portion of rent is as follows:

<table>
<thead>
<tr>
<th>Calculation</th>
<th>Formula</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) Gross Annual Income</td>
<td>(a)</td>
</tr>
<tr>
<td>(b1) Deduction of $480.00 for each minor dependent (under 18 years of age)</td>
<td>(b1)</td>
</tr>
<tr>
<td>(b2) Deduction of $400.00 for a head of household who is 62 and older, or</td>
<td></td>
</tr>
<tr>
<td>permanently disabled</td>
<td>(b2)</td>
</tr>
<tr>
<td>(c) Adjusted Annual Income</td>
<td>(c)</td>
</tr>
<tr>
<td>[calculation: (a) – (b1 + b2)]</td>
<td>(c)</td>
</tr>
<tr>
<td>(d) Adjusted Monthly Income</td>
<td>(d)</td>
</tr>
<tr>
<td>[calculation: (c)/12]</td>
<td>(d)</td>
</tr>
<tr>
<td>(e) 30% of Adjusted Monthly Income</td>
<td>(e)</td>
</tr>
<tr>
<td>[calculation: (d) * 0.30]</td>
<td>(e)</td>
</tr>
<tr>
<td>(f) Tenant paid utility allowance</td>
<td>(f)</td>
</tr>
<tr>
<td>(g) Tenant’s share of rent</td>
<td>(g)</td>
</tr>
<tr>
<td>[calculation: (e) – (f)]</td>
<td>(g)</td>
</tr>
</tbody>
</table>

3.3.2 UNIT SELECTION

The case manager notifies the applicant of the time they have from the date their application is approved to locate a suitable unit. The applicant (with assistance from the case manager if necessary) locates a unit within prescribed time period and submits a Request for Tenancy Approval to the TBRA staff. Staff contacts the prospective landlord by phone and explains the TBRA program and the payment structure within five business days. If the landlord indicates he will participate in the program staff schedules an inspection, within five business days. (Each funding source has specific inspection standards required.) In the event the applicant has not located a unit within the prescribed time period, they can request an extension of time by contacting the TBRA.

3.3.3 INSPECTION OF UNIT IDENTIFIED BY TENANT

To be deemed eligible for the program units must meet the required standards, including the space requirements that meet the regulatory requirement to “provide for the smallest number of bedrooms needed to house a family without overcrowding.”

The inspection staff conducts the Inspection and writes up the results for the file.

Staff must also complete a Lead Based Paint Inspection to verify compliance with the Lead Safe Housing Rule – 24 CFR Part 35 (for units built before 1978 that house children under the age of six).

(This requirement will apply if the program is extended beyond the 3-month time frame.)
The Lead-Based Paint Inspection will consist of a visual assessment for deteriorated paint (cracking, scaling, peeling, or chipping paint as well as visible dust, debris, and paint chips). The owner shall stabilize each deteriorated paint surface in accordance with §35.1330(a) and §35.1330(b) before occupancy of a vacant dwelling unit.

If the Unit fails the required inspection standards or inspection for lead, the landlord is provided with a list of deficiencies found and given ___ days to abate the issue. At the end of ___ days the landlord contacts the inspection staff to set-up another inspection date. If the issues have been fixed and the unit passes the inspection, the tenant is notified that the unit is approved. If the unit fails – the inspector notifies the landlord and the applicant that the unit is not eligible for the program. The applicant is notified to continue to look for an eligible unit.

3.3.4 APPROVAL OF UNIT
If the Unit passes, a contract with the landlord is executed and sent to the landlord, along with the approved lease (or with any required lease revisions) within ___ business days. The landlord is required to sign and return the contract within ___ business days.

The applicant is notified within one business day that the unit qualifies for the program. Staff informs the applicant that they will be notified when the contract with the landlord is executed.

3.3.5 REVIEW OF LEASE
Once the unit passes the inspection, staff reviews the lease within and returns it to the landlord along with the program contract. If staff approves the lease, staff generates a contract and sends it to the landlord with a letter asking the landlord to sign and return the contract, within five business days. If the contract is not received within five business days, staff contacts the landlord to request immediate return of the contract.

When staff receives the signed contract, TBRA Manager signs the contract and the contract is placed in file. The staff notifies the applicant that the contract is signed. No payments can be authorized without a contract signed by the landlord and a fully executed lease.

3.3.6 TENANT MOVES IN
Upon notification of the staff, the applicant contacts the landlord. The landlord must disclose information concerning lead-based paint and/or lead-based paint hazards for housing units built before 1978. This information must be provided to the new tenants before they sign the lease. All prospective tenants will receive a copy of the following documents prior to occupying the unit:
3.3.7 TENANT ASSISTANCE SERVICES
(For certain funding sources, case management services are required)
All program participants will be provided with social services assistance by Housing Counseling or other appropriate social services agencies. These services may also include:

- Child care services referrals,
- Household budgeting,
- Social services counseling and referral,
- Physical and/or behavioral health services,
- Job training and placement services

3.4 FINANCIAL MANAGEMENT
3.4.1 SET UP AWARD INFORMATION IN ELECTRONIC FINANCIAL MANAGEMENT SYSTEM:
The staff inputs all of the required information into _____________.

3.4.2 AWARD DISBURSEMENTS:
On a monthly basis, landlords will be paid via the check run when the draw is approved - Fiscal staff will draw down the CDBG-DR funds from the U.S. Treasury.

3.4.3 CHANGES IN TENANT OCCUPANCY
[This text will be adapted based on waivers granted regarding period of assistance]

At the end of the first lease term of the TBRA voucher, the tenant may be eligible to receive an additional ___________ months of assistance. Staff notifies the tenant and the landlord ___ days prior to the end of the lease that the Voucher will expire unless both parties agree to an extension within ___ business days of the notification and both the tenant and the unit still meet the program’s criteria.

The contract rent is agreed to and the contract is amended as needed. The landlord and tenant revise the existing lease or enter into a new lease agreement for the remaining _____ months.

3.5 REPORTING
3.5.1 MONTHLY RECONCILIATION
Reports will be generated on a monthly basis to track program expenditures.
3.5.2 QPR

QPR information will be reported quarterly.

3.6 MONITORING

[Insert description of monitoring plan for the program.]

3.7 RECORD KEEPING

HUD requires quarterly reporting on all CDBG-DR activities and completion of HUD’s Quarterly Progress Report (QPR). Staff will report on the activity until it is determined to be complete at which time the need for reporting ends.

3.8 CLOSE OUT

Staff must maintain electronic and hard copies of all documents related to the Program for 3 years after the close out of the total CDBG-DR grant award. These records are made available to HUD and the OIG as requested.
Sample Form: Self-Certification of Homelessness or at Risk of Homelessness

The following can be used as a self-certification form or be adapted to communicate program eligibility requirements. This will not be acceptable in every circumstance, so understanding various program regulatory and statutory requirements will be critical.

Pursuant to the provisions of the Federal Register Notice a waiver has been granted to extend tenant based rental assistance to households impacted by the disaster who are experiencing or at risk of homelessness. There are many ways in which a household may be determined to be experiencing or at risk of homelessness.

Please indicate below the one (or more) that most closely describes your situation:

- □ Living in a place not meant for human habitation, such as cars, parks, sidewalks, abandoned buildings, on the street.
- □ In a shelter.
- □ In transitional or supportive housing.
- □ In any of the above places, but spending a short time (up to 30 consecutive days) in a hospital or other institution.
- □ Is being evicted from a private dwelling unit and lacks resource or support network to obtain other housing.
- □ Is being discharged from an institution such as a mental health or substance abuse treatment facility or jail/prison when the person has been a resident for more than 30 consecutive days and no subsequent housing has been identified.
- □ Is fleeing domestic violence.
- □ Has moved because of economic conditions 2 or more times in the past 60 days.
- □ Is living in the home of another due to economic hardship.
- □ Is living in a hotel or motel and cost is not being paid by federal, state, or local programs for low-income individuals.
- □ Lives in an SRO or efficiency apartment where there are more than 2 persons.
- □ Lives in a larger housing unit where there are more than 1.5 persons per room.
- □ Is exiting a publicly funded institution or system of care.
- □ Lives in housing that has characteristics associated with instability and an increased risk of homelessness.
- □ Evidences other circumstances that have a high probability of putting the household at risk of homelessness (provide explanation: ____________________________________________)

Applicant Name (please print):

Applicant Signature:

Date:
# Funding Summary: Resources to Support Tenant Assistance Post-Disaster

<table>
<thead>
<tr>
<th>Type of Assistance</th>
<th>Funding Source &amp; Federal Agency</th>
<th>Funding Recipient (e.g., administering entity)?</th>
<th>Eligible Uses</th>
<th>Length of Assistance</th>
<th>Potential Barriers or Key Differentiating Factors</th>
</tr>
</thead>
</table>
| Rapid Re-Housing                       | ESG (Emergency Solutions Grant) | Metropolitan cities, urban counties, territories, and states | • Rental Assistance  
• Support Services such as: Housing Search/Placement/Relocation, Moving Costs, Tenant/Landlord Services (mediation and legal services)  
• Utility Payments  
• Rental Application Fees  
• Security Deposits/First/Last Month Rent | Short- and medium-term, up to 24 months, including rental arrears up to six months | • ESG funding requires housing funded under rapid re-housing to meet habitability standards. A [checklist for ESG habitability standards](https://www.usich.gov/resources/uploads/asset_library/Federal_Funding_Sources_RRH.pdf) is available to support program staff assess housing units. |
| Rapid Re-Housing: Tenant-Based Rental Assistance | CoC (Continuum of Care) | Private nonprofit organizations, states, local government, instrumentalities of state and local government, and PHAs | • Rental Assistance  
• Support Services such as: Housing Search/Placement/Relocation, Moving Costs, Tenant/Landlord Services (mediation and legal services)  
• Utility Payments and Deposits  
• Rental Application Fees  
• Security Deposits/First/Last Month Rent | Short- and medium-term for RRH, plus longer-term for TBRA program | • Applications for rapid re-housing funds (new or renewal) must be made through the annual CoC program competition.  
• Assistance may be modified post disaster: a. increased to allow for the most vulnerable households to be served with more subsidies and for a longer period of time or b. decreased to allow for more households to be served for a shorter period of time. |

---


3 For all programs funded by HUD, check out the [Grantee Page](https://www.hudexchange.info/homelessness-assistance/disaster-recovery-homelessness-toolkit/recoveryguide/) on the HUD Exchange to find contact information, awards, jurisdiction, and other data for organizations that receive HUD funding.
<table>
<thead>
<tr>
<th>Type of Assistance</th>
<th>Funding Source &amp; Federal Agency(2)</th>
<th>Funding Recipient (e.g., administering entity)?</th>
<th>Eligible Uses</th>
<th>Length of Assistance</th>
<th>Potential Barriers or Key Differentiating Factors</th>
</tr>
</thead>
<tbody>
<tr>
<td>Homeless Prevention and Rapid Re-Housing</td>
<td>SSVF (Supportive Services for Veteran Families)</td>
<td>Private nonprofit organizations and consumer cooperatives who can provide supportive services to eligible populations.</td>
<td>Rental Assistance</td>
<td>Short- and medium-term</td>
<td>SSVF grantees adjust the amount of financial assistance, case management supports, and other services based on a reassessment process and housing stability review to ensure that sufficient assistance is being provided to the Veteran household to ensure housing stability and avoid returns to homelessness.</td>
</tr>
<tr>
<td></td>
<td>Veteran Affairs</td>
<td></td>
<td>Support Services such as: Housing Search/Placement/Relocation, Moving Costs, Tenant/Landlord Services (negotiation and legal services)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Utility Payments</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Rental Application Fees</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Security Deposits/First/Last Month Rent</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Special Provisions for Persons Fleeing Domestic Violence</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rapid Re-Housing</td>
<td>TANF</td>
<td>State/Tribal/Territory TANF office</td>
<td>Rental Assistance</td>
<td>Short- and medium-term, including hotel and motel vouchers</td>
<td>Because the use of TANF funds for housing is at the jurisdiction’s discretion, states, tribes, and territories have flexibility to coordinate the use of TANF funds with other rapid re-housing funds to either provide higher levels of assistance to families, or to serve a greater number of families in need. For example, TANF could be used to pay for rental assistance while ESG is used to pay for supportive services to help a family remain housed.</td>
</tr>
<tr>
<td></td>
<td>Health and Human Services</td>
<td></td>
<td>Support Services such as: Housing Search/Placement/Relocation, Moving Costs, Tenant/Landlord Services (negotiation and legal services)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Utility Payments</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Rental Application Fees</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Security Deposits/First/Last Month Rent</td>
<td></td>
<td></td>
</tr>
<tr>
<td>TBRA</td>
<td>HOME Investment Partnership Program</td>
<td>Metropolitan cities, urban counties, territories, and states</td>
<td>Rental Assistance</td>
<td>Medium- and long-term</td>
<td>The cost to administer a HOME TBRA program cannot be charged as a project cost and must be paid out of the jurisdiction’s administrative budget and subject to the 10% cap of HOME funds that may be spent on administrative costs. HOME funds cannot be used for non-housing-related activities.</td>
</tr>
<tr>
<td></td>
<td>HUD</td>
<td></td>
<td>Utility Payments</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Security Deposits</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Type of Assistance</td>
<td>Funding Source &amp; Federal Agency(^2)</td>
<td>Funding Recipient (e.g., administering entity)?</td>
<td>Eligible Uses</td>
<td>Length of Assistance</td>
<td>Potential Barriers or Key Differentiating Factors</td>
</tr>
<tr>
<td>-------------------</td>
<td>-----------------------------------</td>
<td>-----------------------------------------------</td>
<td>--------------</td>
<td>---------------------</td>
<td>-----------------------------------------------</td>
</tr>
<tr>
<td>TBRA</td>
<td>CDBG (Community Development Block Grant): CDBG-DR (Community Development Block Grant – Disaster Funds)</td>
<td>Metropolitan cities, urban counties, territories, and states</td>
<td>Rental Assistance, Support Services such as: Housing Search/Placement/Relocation, Moving Costs, Tenant/Landlord Services (negotiation and legal services), Utility Payments, Rental Application Fees, Security Deposits/First/Last Month Rent</td>
<td>Short-term</td>
<td>Local jurisdictions rarely use CDBG for TBRA and may not be accustomed to using this funding source for this purpose.</td>
</tr>
<tr>
<td></td>
<td>HUD</td>
<td></td>
<td></td>
<td></td>
<td>Must combine multiple eligible activities to ensure the recommended core components of a post-disaster tenant rental assistance program are included.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Depending on size of the disaster, CDBG-DR funds may be a community's largest funding source with greatest flexibility: discuss with the HUD representative various waivers that may support increased flexibility, such as length of time assistance may be provided.</td>
</tr>
<tr>
<td>Housing Choice Voucher</td>
<td>HUD-sponsored Tenant Based Voucher NOFA HUD</td>
<td>Public Housing Authority (Find your local PHA <a href="https://www.hudexchange.info/homelessness-assistance/disaster-recovery-homelessness-toolkit/recoveryguide/">here</a>)</td>
<td>There are several different types of vouchers that a PHA may administer such as Tenant Based Vouchers, HUD-VASH vouchers, Family Unification Vouchers. Each may have different eligible uses. Typically, they include: Rental Assistance, Utility Payments, Support Services when a Voucher program is coupled with Family Self-Sufficiency (FSS) program</td>
<td>Medium- and Long-term</td>
<td>Waiting lists are common for PHA’s vouchers. Post disaster, determining allocation of vouchers can prove difficult.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>PHA’s long history in implementing tenant rental assistance programs may prove beneficial in training staff and borrowing systems.</td>
</tr>
</tbody>
</table>