

EMERGENCY HOUSING VOUCHERS

A Guide to Effective Use of Services Fees

Contents

Section 1: Introduction and Purpose	3
Emergency Housing Voucher (EHV) Program	3
EHV Services Fees	3
Purpose	4
Section 2: Understanding EHV Services Fees	5
Overview of Services Fees	5
Eligible Uses	5
Housing Search Assistance	6
Security Deposit, Utility Deposit, Rental Application, Holding Fee, and Arrears Uses	7
Owner-Related Uses	9
Other Eligible Uses	9
Pre-tenancy Services and Services that Support EHV Families	
in Fulfilling Their Family Obligations Under the EHV Program	10
Additional Guidance	11
Section 3: Best Practices for Using Services Fees	13
Building Strong Partnerships	13
Engaging with Landlords and Property Owners	14
Evaluating and Expanding Services Fee Activities	15
Streamlining EHV Processes	15
Section 4: Reporting and Compliance for Services Fees	17
Reporting Services Fees	17
Accounting and Financial Management	17
Documentation and Compliance	17
Portability and Billing	17
Monitoring Procedures	18
HUD Notices and Guidance	19
Training and Technical Assistance	19
APPENDIX: Table of Allowable Service Fee Expenditures	Α1

This resource is prepared by technical assistance providers and intended only to provide guidance. The contents of this document, except when based on statutory or regulatory authority or law, do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

Section 1: Introduction and Purpose

Emergency Housing Voucher (EHV) Program

The Emergency Housing Voucher (EHV) program is a voucher program administered by the U.S. Department of Housing and Urban Development (HUD) and carried out by Public Housing Agencies (PHAs) in partnership with Continuums of Care (CoCs) and Victim Service Providers (VSPs).

The primary form of assistance provided by the EHV program is through tenant-based rental assistance in the form of a housing voucher. The EHV program is specifically designed to assist eligible individuals and families¹ who:

- Are experiencing homelessness,
- Are at risk of experiencing homelessness,
- Are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or
- Were recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing instability.²

EHVs play a critical role in providing support to individuals and families experiencing or at risk of homelessness or housing instability. EHVs not only help with immediate housing needs but can also provide a range of services to support individuals and families retain housing and work towards long-term housing stability.³

The purpose of this guide is to centralize available guidance about the use of EHV services fees, eligible uses, and considerations for the effective use of fees, as well as highlight best practices that will support PHAs, CoCs, and VSPs in maximizing successful outcomes for EHV households.

EHV Services Fees

EHV services fees are one type of administrative fee provided to PHAs for the administration of the EHV program. EHV services fees can be used for a variety of services to aid eligible individuals and families. The importance of services fees is twofold: They allow PHAs to provide crucial assistance to vulnerable individuals and families in securing and maintaining stable housing; they also support the local housing market by providing incentives for landlords to participate in the program. EHV services fees are categorized into four main components:

- 1. Housing Search Assistance
- 2. Security, Utility Deposit, Rental Application, Holding Fee Uses, and Arrears
- 3. Owner-Related Uses
- 4. Other Eligible Uses

^{1.} While the ARP and the definitions of the qualifying categories specifically refer to "individuals and families," under the HCV program regulations at 24 CFR 982.4, the term "family" is a person or a group of persons, as determined by the PHA consistent with 24 CFR 5.403, approved to reside in a unit with assistance under the program. The term "family" used in EHV/HCV context always includes a family that is comprised of a single individual as well as a group of persons. We also refer to "families" here as "households."

^{2.} U.S. Department of Housing and Urban Development. Emergency Housing Vouchers – Operating Requirements. May 5, 2021. Accessible at: https://www.hud.gov/sites/dfiles/PIH/documents/PIH2021-15.pdf.

^{3.} U.S. Department of Housing and Urban Development. Emergency Housing Vouchers: A How-To Guide for Public Housing Agencies. June 2022. Accessible at: https://files.hudexchange.info/resources/documents/Emergency-Housing-Vouchers-How-To-Guide-For-Public-Housing-Agencies.pdf.

By understanding eligible uses of EHV services fees, PHAs, CoCs, VSPs, and other service providers can better navigate the program and ensure the most effective use of these essential resources.⁴ This guide explores the key components of EHV services fees, eligible uses, and best practices for allocating and managing fees effectively.

Purpose

The purpose of this guide is to centralize available guidance about the use of EHV services fees, eligible uses, and considerations for the effective use of fees, as well as highlight best practices that will support PHAs, CoCs, and VSPs in maximizing successful outcomes for EHV households. This guide aims to empower PHAs and communities to identify and apply EHV best practices in order to provide efficient, equitable, and effective housing assistance to those in need, in compliance with the guidelines set forth by HUD. This guide is designed to:

- Enhance understanding and provide clarity on the variety of uses for services fees in the administration and management of EHVs;
- ✓ Provide guidance on best practices and examples of successful community approaches to using EHV services fees;
- ✓ Support PHAs in effective budget planning, resource management, and regulatory compliance associated with EHV services fees;
- ✓ Facilitate transparency and promote equal access by providing EHV applicants, voucher holders, landlords, service providers, and community partners with information on EHV services fees;

 and
- ✓ Serve as a reference for PHAs and others to better understand and meet their service obligations related to the EHV program.

For additional information on EHV operating requirements and services fees, please refer to the HUD website on EHV Service Fee Guidance, Tips, and Resources, Notice PIH 2021-15 (HA): Emergency Housing Vouchers – Operating Requirements, Notice PIH 2021-25 (HA): Emergency Housing Vouchers – Voucher Management System and Financial Data Schedule Reporting Requirements, and Notice PIH 2023-23 (HA): Emergency Housing Voucher (EHV): Expanded Use of the EHV Services Fee.

^{4.} U.S. Department of Housing and Urban Development. Notice PIH 2021-25. Emergency Housing Vouchers – Voucher Management System and Financial Data Schedule Reporting Requirements. August 20, 2021. Accessible at: https://www.hud.gov/sites/dfiles/PIH/documents/PIH2021-25.pdf

^{5.} U.S. Department of Housing and Urban Development. EHV Service Fee Guidance, Tips, and Resources. Accessible at: https://www.hud.gov/program_offices/public_indian_housing/ehv/sfg.

^{6.} U.S. Department of Housing and Urban Development. Notice PIH 2021-15 (HA). Emergency Housing Vouchers – Operating Requirements. Accessible at: https://www.hud.gov/sites/dfiles/PIH/documents/PIH2021-15.pdf.

^{7.} U.S. Department of Housing and Urban Development. Notice PIH 2021-25 (HA). Emergency Housing Vouchers – Voucher Management System and Financial Data Schedule Reporting Requirements. Accessible at: https://www.hud.gov/sites/dfiles/PIH/documents/PIH2021-25.pdf.

^{8.} U.S. Department of Housing and Urban Development. Notice PIH 2023-23 (HA): Emergency Housing Voucher (EHV): Expanded Use of the EHV Services Fee. Accessible at: https://www.hud.gov/sites/dfiles/OA/images/2023-23pihn.pdf

Section 2: Understanding EHV Services Fees

Overview of Services Fees

EHV services fees are a type of administrative fee that play a crucial role in facilitating the successful leasing and retention of EHVs as well as providing comprehensive support to eligible individuals and families. PHAs with an EHV allocation are provided with a one-time EHV services fee of \$3,500 per allocated EHV to support implementation and operation of the EHV program. The services fee is not tied to a specified household and is designed to provide a menu of services that will address the unique needs and leasing challenges faced by EHV-eligible individuals and families.

Important Note:

PHAs are provided with a one-time EHV services fee of \$3,500 per allocated voucher. The fee is not tied to a specified household.

Eligible Uses

Apart from housing search assistance, which PHAs are required to provide to all families during their initial search, PHAs have the flexibility to use services fees for a range of eligible activities aimed at addressing the needs and leasing challenges faced by EHV households. Eligible uses of EHV services fees are categorized into four main components:

- 1. **Housing Search Assistance:** Eligible activities related to helping a family find suitable housing can include hiring staff, helping a household identify and visit available units, providing transportation and directions, assisting with paperwork, and expediting the EHV leasing process.
- Security Deposit, Utility Deposit, Rental Application, Holding Fee Uses, and Arrears: Services fees
 can be used to cover security deposits, utility deposits, rental application fees, holding fees, utility arrears.
 It can also cover rental arrears, but only if the arrears are a barrier to leasing the unit.
- 3. Owner-Related Uses: Services fees can be used for outreach and recruitment of landlords, conducting pre-inspections of units, or otherwise expediting the inspection process, providing enhanced customer service, and offering owner incentive and/or retention payments for landlords entering into or renewing leases with EHV households.
- 4. **Other Eligible Uses:** This covers various other costs associated with moving and settling into a new home, including move-in fees, deposits, storage expenses, essential household items, and renter's insurance (if required by the lease). It also includes pre-tenancy services and services that support EHV individuals and families in fulfilling their family obligations under the EHV program.

In the first two exceptions above, the PHA must enter into a partnership to receive direct referrals from another entity (e.g., a homeless service provider, VSP, or anti-trafficking service provider if the CE system is not referring victims fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking). HUD will advise this direct referral process if going outside of the standard CE system. HUD may permit the PHA on a temporary or permanent basis to take EHV applications directly from applicants in certain circumstances.

PHAs may use the services fee to provide any or all of the defined eligible uses to assist individuals and families to successfully lease units or maintain tenancy with EHVs. PHAs may limit the amount of assistance that it provides for any of the eligible uses and place other restrictions on those uses. However, the services fees must be used for these defined eligible uses and not for other administrative expenses of the EHV. All eligible uses of EHV services fees implemented by the PHA, and the parameters and requirements for these uses, must be described in the PHA's administrative plan and adopted after consultation with its CoC partner(s). PHAs must take special care to ensure allowable uses of services fees are documented in accordance with HUD guidance included in PIH 2023-23 (HA), "Appendix: Table of Allowable Service Fee Expenditures."

Figure 1: Eligible Uses of EHV Services Fees

Many activities including, but not limited to: Hiring staff to carry out housing search assistance **Housing Search** Helping households identify and visit potential units, including transportation **Assistance** Help finding units that meet disability-related needs Housing mobility services to encourage moves to high opportunity neghborhoods Assisting with rental applications and PHA forms Security, Utility Deposit, Security deposit assistance Rental Application, Utility deposit assistance Holding Fee Users, Assistance with utility arrears **Arrears** Rental application and holding fees Assistance with rental arrears to private landlords if arrears are a barrier to leasing an EHV unit Owner recruitment and outreach Owner-Related Uses Conducting pre-inspections and expediting the inspection process Owner incentive payments Owner retention payments Property damage or unpaid rent mitigation fund Moving expenses, including move-in fees, deposits, storage expenses, lock change fees, and deposits **Other Elgible Uses** Pre-tenancy and tenant-readiness services to mitigate barriers such as negative credit or lack of credit, negative rental or utility history, or arrears Services that support households in fulfilling obligations under the EHV Program Essential household items Renter's insurance if required by lease

Housing Search Assistance

Housing search assistance is a critical requirement of the EHV program and can be funded by use of EHV administrative or services fees. Housing search assistance aims to expedite the lease-up of EHV units and ensure adequate support is provided to households in locating and accessing affordable housing within their community. As detailed in HUD Notice PIH 2021-15, PHAs are required to ensure housing search assistance is made available to EHV households during their initial housing search. Housing search assistance may be provided directly by the PHA or through the CoC or another partnering agency or entity.

Required Housing Search Assistance

Components of required housing search assistance include:

- Helping households identify potentially available units during their housing search, including physically accessible units with features for family members with disabilities, as well as units in lowpoverty neighborhoods;
- Providing transportation assistance and directions to potential units;
- Conducting owner outreach;
- Assisting with the completion of rental applications and PHA forms; and
- Helping expedite the EHV leasing process for EHV households.

Recommended Housing Search Assistance

Other recommended, but not required, housing search activities include helping EHV holders identify barriers to leasing (e.g., low credit score, history of evictions, etc.) and strategies to address these barriers. Such strategies include workshops on how to conduct an effective housing search (see Housing Mobility Toolkit), enhanced support for portability processing, regular proactive check-ins for families searching with a voucher, regular reminders on voucher expiration dates and extension policies, and a dedicated landlord liaison for EHV households.

Important Note:

Housing search assistance may be provided directly by the PHA or through the CoC or another partnering agency or entity. If the PHA is contracting with another entity to provide Housing Search services, the PHA 's procurement policies must be followed and the contract must be in place prior to those activities beginning.

Eligible Uses

EHV services fees can be used to deliver housing search assistance to EHV households. Eligible uses include, but are not limited to:

- ✓ Locating, visiting, and applying for housing
- Providing listings of affordable units accepting vouchers
- Providing transportation to and from housing option viewings
- Providing housing mobility services to encourage moves to high opportunity neighborhoods
- Assisting in completing housing applications and PHA forms
- ✓ Identifying housing that meets a household's disability-related needs
- ✓ Staffing a dedicated landlord liaison position for EHV households

Security Deposit, Utility Deposit, Rental Application, Holding Fee, and Arrears Uses

EHV services fees can also be applied toward assistance with security deposits, utility deposits, rental applications and holding fees as well as utility and rental arrears. This is to ensure that EHV participants are not hindered by immediate, upfront costs associated with securing a rental unit. Below is an overview of each of these eligible uses.



EHV Community Spotlight: King County, Washington

King County, Washington successfully implemented housing navigation services by allocating a portion of its EHV services fees to nonprofit organizations for the delivery of housing search assistance. King County Housing Authority (KCHA) expanded its referral and service provider network by signing agreements with 80 community-based organizations. They also created housing navigator contracts with network organizations and earmarked assistance funds to mitigate financial barriers, including housing application fees, holding fees, moving expenses, and deposits. In addition, KCHA and partners created a streamlined universal application and process to ease the housing search and facilitate better communication for housing referrals.

Security Deposit Assistance

The PHA may choose to pay the security deposit assistance directly to the housing owner or may pay the assistance to the family, provided the PHA verifies that the family paid the security deposit. The amount of the security deposit assistance may not exceed: 1) the lesser of two months' rent to the owner; 2) the maximum-security deposit allowed under applicable state and/or local law; or 3) the actual security deposit required by the owner. The PHA may place conditions on the security deposit assistance, such as requiring the owner or family to return the security deposit assistance to the PHA at the end of the family's tenancy (less any amounts retained by the owner in accordance with the lease). PHAs are encouraged to consult with their counsel to determine whether local and State statutes regarding unclaimed property may apply. Security deposit assistance returned to the PHA must be used for either services fee eligible uses or other eligible EHV administrative costs.

Utility Deposit Assistance and Utility Arrears

Assistance can be provided for utility deposits (including utility connection fees) required for the utilities to be supplied by the tenant under the lease. The PHA may choose to pay the utility deposit assistance directly to the utility company or may pay the assistance to the family, provided the PHA verifies that the family paid the utility deposit. The PHA may place conditions on the utility deposit assistance, such as requiring the utility supplier or family to return the utility deposit assistance to the PHA at such time the deposit is returned by the utility supplier (less any amounts retained by the supplier). In addition, some households may have large balances with gas, electric, water, sewer, or sanitation providers that will make it difficult, if not impossible, to establish services for tenant-supplied utilities. The PHA may also provide assistance to help address these utility arrears to facilitate leasing. Utility deposit assistance that is returned to the PHA must be used for either eligible services fee uses or other eligible EHV administrative costs.

Rental Application and Holding Fees

Services fees may also be used for rental application fees, non-refundable administrative or processing fees, broker fees, and/or refundable application deposit assistance. The PHA may also elect to cover all or part of the holding fee for units where the fee is required by the owner. The owner and the PHA must agree and understand how the holding fee is rolled into the deposit and under what terms the fee may be returned. The holding fee does not replace the owner's duty to make needed repairs to a unit required by Housing Quality Standard (HQS) inspection, and the owner may not keep the holding fee unless the EHV voucher holder is at fault for not entering into a lease.



Rental Arrears to Private Landlords for Admission

The PHA may assist to EHV applicants to help address rental arrears that are a barrier to leasing a unit. The PHA may choose to pay the rental arrears directly to the landlord or may pay the rental arrears to the family, provided the PHA verifies the family has paid the rental arrears. The PHA may not use the services fee to pay for debts owed by the family to the PHA, another PHA, or a closely-associated entity affiliated with the PHA. Additionally, the services fee may not be used to pay the rental arrears of a current EHV participant in an EHV-assisted unit.

Owner-Related Uses

The PHA may use EHV services fee funding to conduct owner recruitment and outreach specifically for EHV households as well as owner incentive and retention payments. This is essential for broadening the pool of available rental units for EHV participants and incentivizing landlords to accept vouchers as well as renew leases with EHV participants.

Owner Recruitment and Outreach

Traditional owner recruitment and outreach activities are eligible costs and may include developing and disseminating marketing materials and brochures (including costs for advertising), building and maintain

landlord contact lists, hosting events (luncheons, workshops), and attending networking opportunities. Additional eligible activities may include conducting pre-inspections or otherwise expediting the housing inspection process and providing enhanced customer service.

Owner Incentive and Retention Payments

The PHA may make incentive or retention payments to owners who agree to initially lease their unit to an EHV family or to renew the lease of an EHV tenant. The PHA may design the owner incentive payment to meet its specific needs. PHAs can, for example, limit the incentive payments to new owners or owners in high-opportunity neighborhoods, to owners

Resources

The HCV Landlord Strategies Guidebook for PHAs shares various strategies PHAs can implement to improve landlord participation.

with accessible units or owners that will make the living conditions accessible (interior/exterior structural modifications) for a person with disabilities, or they can structure all or part of the payment as a property damage or unpaid rent mitigation fund where the owner receives the mitigation payment only if the security deposit is insufficient to cover damages and other amounts owed under the lease.⁹

Other Eligible Uses

In addition to the above eligible uses for services fees, PHAs can use services fee funding to offer support in the following areas:

Moving Expenses

When relocating to a new residence, tenants often encounter a series of expenses. The PHA may help with some or all of the family's reasonable moving expenses when they initially lease a unit with the EHV, including move-In fees, storage expenses, lock changes, and hiring of moving company and/or truck rental.

^{9.} U.S. Department of Housing and Urban Development. A How-To Guide for Public Housing Agencies. 2022. Accessible at: https://files.hudexchange.info/resources/documents/Emergency-Housing-Vouchers-How-To-Guide-For-Public-Housing-Agencies.pdf

The PHA may not provide moving expenses assistance for subsequent moves unless the family is required to move for reasons other than something the family did or failed to do (e.g., the PHA is terminating the Housing Assistance Payments (HAP) contract because the owner did not fulfill the owner responsibilities under the HAP contract or the owner is refusing to offer the family the opportunity to enter a new lease after the initial lease term, as opposed to the family choosing to terminate the tenancy in order to move to another unit), or a family has to move due to domestic violence, dating violence, sexual assault, or stalking, for example.

Pre-tenancy Services and Services that Support EHV Families in Fulfilling Their Family Obligations Under the EHV Program

PHAs may use services fee funding to help create customized plans to address or mitigate barriers that individuals and families may face in renting a unit with an EHV, such as negative credit, lack of credit, negative rental or utility history, or to connect the family to other community resources that can assist with rental arrears.

PHAs may also use services fee funding to mitigate barriers that individuals and families may face in maintaining occupancy of a unit with an EHV, such as providing access to case management, wrap-around services, life skills training (e.g., balancing a budget, paying bills on time, opening a savings account, maintaining a living space, securing a credit card, paying off debt, etc.), financial stability training, mental health care (e.g., travel costs to counseling, and co-pay charge, etc.), and/or a stability coordinator.

EHV services fee funding can also be used for services to remedy a lease violation/prevent an eviction (e.g., rectifying unsanitary living conditions or property damage) and may establish a cap/threshold for this service; this excludes financial assistance for rental/utility arrears. All services and training provided must be voluntary for the family and cannot be a condition of the lease or a PHA requirement for admission continued participation in the EHV program. Additionally, PHAs may pay fees for families to obtain vital documents needed to establish eligibility for the program and/or required by landlords as part of their rental application (e.g., application fees and costs for birth certificates, reasonable transportation costs to obtain social security cards or other documentation needed for eligibility, etc.).

Important Note:

PHAs may not use the EHV services fee to pay for moving expenses for subsequent moves. However, this limitation only applies to Moving Expenses. The PHA is able to use the EHV services fee to assist households for subsequent moves for all other eligible uses of the services fee.

Important Note:

Hiring a stability coordinator can be an effective way to improve housing retention among EHV participants and ensure full utilization of EHV service fee funding. For example, a PHA with 150 EHVs received \$525,000 in service fee funding (\$3500 per voucher). The PHA fully leased the EHV vouchers and still has \$100,000 remaining in Service Fees. Based on the local market and target population served, the PHA determines that one full-time Stability Coordinator is needed and would cost \$71,500/year in salary and fringe benefits. The PHA could also consider contracting this service out to a CoC partner agency or another entity.

Essential Household Items

Transitioning into a new living space requires more than just walls and a roof. The PHA may use the services fee funding to assist the family with some or all of the costs of acquiring essential household items as defined by the PHA. Essential household items may include, but are not limited to:

- Tableware
- Bedding
- Furniture

- Toiletries
- Cleaning supplies, etc.

Assistance with essential household items can be provided directly to EHV households via a pre-paid gift card (e.g., Visa, Mastercard, American Express), provided that the PHA verifies the family has purchased essential household items and obtains and maintains appropriate supporting documentation (e.g., a receipt). HUD recommends PHAs work with local food banks, federal lifeline assistance, Salvation Army, and other organizations that may assist in providing families assistance with securing groceries and toiletries.

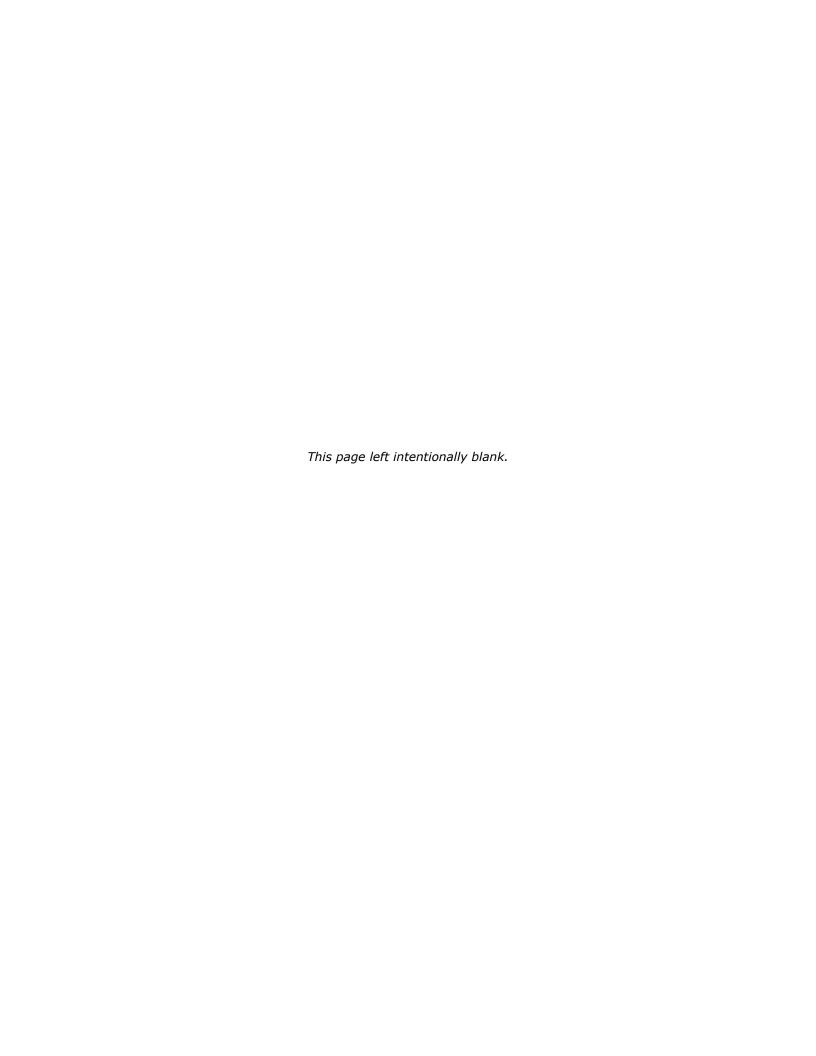
Renter's Insurance:

Leases sometimes mandate that tenants obtain renter's insurance. This insurance provides coverage for personal property in case of theft, damage, or other unforeseen circumstances. If such a requirement exists, the PHA's services fees can cover the insurance cost.

Additional Guidance

For detailed and up-to-date information on services fees and the administration of EHVs, it is recommended to refer to official HUD guidelines, including <u>Notice PIH 2021-15</u>: <u>Emergency Housing Vouchers – Operating Requirements and Notice PIH 2023-23 (HA)</u>: <u>Emergency Housing Voucher (EHV)</u>: <u>Expanded Use of the EHV Services Fee</u>.





Section 3: Best Practices for Using Services Fees

This section highlights four best practices categories in which PHAs, CoCs, and VSPs can take action to maximize successful outcomes for EHV households. Building strong partnerships, engaging landlords and property owners, evaluating, and expanding services fee activities, and streamlining EHV processes are all positive actions that can leverage EHV services fees to benefit eligible households.

Building Strong Partnerships

The development of strong partnerships is essential for the successful implementation of the EHV program and the effective use of services fees. By actively engaging stakeholders and partners, including CoCs, referral partners, service providers, EHV households, landlords, and community members, PHAs can maximize the impact of services fees and ensure that eligible households receive the support they need to cultivate long-term housing stability. To help center equity, PHAs should actively collaborate and engage with community stakeholders to identify existing resources and services that can help support EHV participants, guide the prioritization of services fee uses, and address gaps to ensure the unique needs of EHV households are met. Open communication, shared goals, and a focus on building strong partnerships contribute to the success of the EHV program and maximize the positive outcomes for eligible individuals and families.

To forge strong partnerships, it can be helpful to consider implementing the following strategies and practices to make the most of collaborations.

Ongoing Collaboration & Communication

- The PHA's and CoC's commitment to administering the EHVs in partnership
- The goals and standards of success in administering the EHVs
- The staff position for each organization that will serve as the lead EHV liaison
- A statement that all parties agree to cooperate with any program evaluation efforts undertaken by HUD, or a HUD-approved contractor, including compliance with HUD evaluation protocols and data-sharing requests
- The specific population eligible for the EHV assistance that will be referred to the PHA by the CoC or other partnering referral agency
- The services, including financial assistance, that will be provided to assist EHV applicants and participants, and who will provide them
- The roles and responsibilities of the PHA and CoC, including but not limited to the CoC's direct referrals of families to the PHA through the CE system

Leverage Existing Resources

- Collaborate with CoCs, referral partners, and service providers regularly to leverage existing resources and
 expertise. This may include housing search assistance, case management, counseling, and other services
 that contribute to the stability and success of EHV households. By understanding what services are already
 being provided in the community, PHAs can leverage these resources, avoid duplication and redundancy in
 services, and ensure that EHV households are able to quickly secure and stabilize in housing.
- CoCs, referral partners, and service providers often offer supportive services that can complement the PHA's suite of EHV services fee uses. For example, if a local service provider already helps with utility arrears for which EHV households are eligible, then the PHA may wish to de-prioritize this potential use of EHV services fees and prioritize uses where there is a gap in services available.

Centering Equity

 Centering equity should be a priority in the utilization of EHVs; building strong partnerships with organizations working with target populations can help advance equitable access to services and outcomes

- by leveraging detailed knowledge and experience working directly with most-impacted communities.
- Building authentic relationships and incorporating contributions into decision-making processes from those
 most impacted, including Black, Indigenous, and People of Color (BIPOC) and people with lived experience
 of homelessness, is key.

Engaging with Landlords and Property Owners

Engaging and collaborating with landlords and property owners is key to expanding housing options and increasing the success of EHV households. Consider implementing the following practices to expedite the leasing process and improve housing outcomes for EHV households:

Enhance Landlord Outreach and Recruitment Activities

- Actively engage with landlords and property owners to learn about their needs and promote the benefits of participating in the EHV program.
- Use EHV services fees to enhance landlord outreach and recruitment activities. Develop outreach campaigns, offer landlord fairs or workshops, and establish partnerships with local landlord and property management associations.
- Highlight the advantages of leasing to EHV households, such as guaranteed rental payments and assistance with tenant-related issues.
- Recognize owners in community events such as annual appreciation gatherings or other social networking events.

Offer Incentives and Support

- Use EHV services fees to offer incentives to landlords, such as signing bonuses or mitigation funds, to encourage their participation in the EHV program. These incentives can help offset any perceived risks or challenges associated with renting to EHV households.
- Provide ongoing support to landlords, such as assistance with tenant screenings, lease negotiations, or addressing concerns promptly.



Michigan Housing Development Authority

Michigan State Housing Development Authority (MSHDA), a statewide PHA, successfully implemented the EHV program through strong partnerships with CoC agencies and Housing Assessment and Resource Agencies (HARAs). These partnerships were developed over time through existing programs such as the HCV program and the annual allocation of Emergency Solutions Grant (ESG) funding.

For MHSDA, the MOU involves various partners, including MSHDA HCV staff and MSHDA-contracted housing agents who handle the day-to-day administration of the EHV and HCV programs. Additionally, the CoC other service agencies are involved in referring families through the CE system and providing EHV-eligible services based on each family's specific needs. These services encompass housing search assistance, owner recruitment and outreach, tenant-readiness services, and support with application fees, security deposits, utility deposits, moving expenses, essential household items, and renter's insurance.

• Consider offering retention bonuses for lease renewals of EHV households.

Evaluating and Expanding Services Fee Activities

To determine the effectiveness of existing EHV program activities and services, regularly review and evaluate activities and consider whether services can be broadened through the use of EHV services fees to meet the EHV needs and gaps that have been identified.

Review and Assessment of Current Activities

- Review the PHA's existing activities, including those funded by EHV services fees, by analyzing EHV practices, processes, and outcomes.
- Measure success by developing, implementing, and tracking clear and measurable benchmarks to gauge the effectiveness of these activities against goals.
- Identify areas where improvements or new initiatives can enhance the effectiveness of services fee activities.

Needs and Gaps Analysis

- Conduct a needs and gaps analysis to understand the specific housing needs of EHV households in your community to determine how expanding services fee activities can help address them.
- Assess the available resources, including EHV services fees, and determine whether they can support the expansion of support activities for EHV households.

Streamlining EHV Processes

Streamlining the administration and reimbursement of EHV services fees is important to enhancing efficiency and supporting EHV individuals and families in obtaining and maintaining safe, stable, and affordable housing. Easier, more equitable access to services and resources as well as a well-organized and managed approach to serving EHV-eligible households through improving processes and collaborating with partners will maximize the impact of services fee uses.



Digitizing Processes

Adopting digital methods can simplify the administration and reimbursement of services fees. This may
include online applications, electronic tracking of funds, and digital reporting tools. These methods help
reduce paperwork and human error, expediting the entire process.

Simplifying Access

• Streamline procedures for accessing eligible services fees uses by removing unnecessary steps and focusing on essential information. Provide clear instructions, and ensure the process is transparent and easily navigable for PHA staff, partner staff, landlords, third parties, and EHV households.

Employing a Coordinated Approach

- Emphasize collaboration between PHAs, CoC, referral partners, and local service providers. A coordinated approach ensures seamless support for EHV households and maximizes the use of services fees.
- Establish well-defined communication pathways among all stakeholders. Regular meetings, updates, and shared online platforms can foster collaboration.
- Collaborate to create and implement support plans that address the unique needs of EHV individuals and families, including housing assistance, counseling, and financial planning.

Conducting Monitoring and Evaluation

• Jointly monitor the progress and evaluate the effectiveness of the services fees' utilization. This shared responsibility helps in identifying areas for improvement and ensures that services fees are used optimally.

Completing Regular Reviews and PHA Administrative Plan Updates

• Consistently review and update PHA administrative plans to ensure that they are in sync with the current regulations for eligible services fees and the PHA's current uses of EHV services fee funding. All eligible uses of EHV services fees implemented by the PHA, and the parameters and requirements for these uses, must be described in the PHA's administrative plan.



Durham, North Carolina

The City of Durham, North Carolina, Collaborative Applicant and Lead Agency for the Durham City and County CoC, provides funding for a Housing Access Coordinator who helps maintain an inventory of affordable housing providers who have agreed to work with the CoC, provides landlord outreach, and acts as the local landlord liaison between service providers and people in active housing search.

In collaboration with the University of North Carolina Chapel Hill's Center for Urban and Regional Studies (CURS) and Socialserve, Durham and Orange County Housing Authorities launched a website that helps EHV households identify housing in higher opportunity areas. The "Housing Opportunity Finder" serves as an inventory of affordable housing listings and provides neighborhood information regarding proximity to grocery stores, schools, public transportation, and health care offices. The website was developed through a partnership between CURS, Community Empowerment Fund, Durham Housing Authority, Orange County Housing Authority, Families Moving Forward, North Carolina Housing Finance Agency, Socialserve and the Orange County Partnership to End Homelessness.

Section 4: Reporting and Compliance for Services Fees

PHAs must record and report EHV expenditures (including service fees) separate from the HCV program. PHAs are required to transmit certain leasing and cost data electronically through the Voucher Management System (VMS). HUD uses VMS data for budget formulation, cash management, monitoring, determining renewal funding levels, and funding-related factors. If PHAs do not spend EHV services fee funds they are at risk of recapture; HUD may recapture unspent EHV services fees and reallocate them to another PHA. Therefore, it is imperative that PHAs comply with reporting requirements and timelines for reporting through VMS, ensuring that the information submitted is both timely and accurate. By establishing robust reporting and monitoring procedures and maintaining accurate records, PHAs can ensure compliance with program requirements and demonstrate responsible stewardship of EHV services fee funds.

Reporting Services Fees

- Services fee funding may never be used for ineligible uses or for the HCV program. PHAs must properly
 account for EHV services fee expenses in accordance with the regulations at 2 CFR, Part 200 and all HUD
 regulations and guidance, including Notice PIH 2021-25 (HA).
- To ensure services fee expenditures are allowable and properly documented, please see the <u>appendix</u> to this guide and PIH 2023-23 (HA), "<u>Appendix: Table of Allowable Service Fee Expenditures</u>."
- In order to maintain transparency and accountability, PHAs must report services fee utilization in VMS, treating EHVs as Special Purpose Vouchers. Accurate reporting is essential, as under-reporting can limit access to available funding.
- PHAs should regularly review VMS data to confirm that the EHV services fee expense are reported accurately across the four main components of eligible uses. If errors are detected, they can be corrected through the Prior Month Correction (PMC) process.

Accounting and Financial Management

- For clear tracking, all accounting records of the EHV program must be kept separate from the HCV program.
- In cases of portability, the initial PHA is responsible for providing timely reimbursement to the receiving PHA for eligible costs, ensuring due diligence and transparency.
- If PHAs do not spend EHV services fee funds they are at risk of recapture; any unused services fee assistance must be returned to HUD when the PHA's EHV program concludes. To help ensure services fees are not recaptured, it may be most effective and efficient to use services fee funds for eligible purposes prior to applying administrative funds to cover these qualifying expenses.

Documentation and Compliance

PHAs are required to maintain supporting documentation for all expenditures of federal funds. Supporting
documentation may include cost allocation plans, receipts, invoices, timecards, etc. A full list of supporting
documentation may be found in the "Appendix: Table of Allowable Service Fee Expenditures."

Portability and Billing

• The EHV program also includes specific protocols for portability (i.e., transferring EHVs to other PHAs) and billing. The initial PHA is obliged to provide services fees for households transferring their EHVs. Both the initial and receiving PHAs must coordinate on the services and assistance provided. The initial PHA can reimburse the receiving PHA for eligible costs, with each PHA having a cap of \$1,750 for portability services fees.

Monitoring Procedures

To ensure proper use of EHV services fees, effective monitoring procedures must be established. This helps ensure compliance with program guidelines and maximize benefits for eligible individuals and families. Key elements in a monitoring strategy for EHV services fees include:

- Clear Eligible Uses: PHAs must clearly define and describe the eligible uses of services fees in their administrative plan, ensuring transparency and accountability in fund use.
- **Tracking Expenditures:** Keeping accurate records of services fee expenditures, including receipts, invoices, and other supporting documentation, facilitates effective oversight and reporting on fee use.
- **Reporting Requirements:** PHAs must report services fee expenses in the VMS under appropriate classifications and in a timely manner. This allows HUD to monitor the program's performance and compliance.
- Avoiding Misuse: Services fees should be used for defined eligible uses and not diverted for administrative expenses. Internal controls should be established to prevent misuse or diversion of services fee funds.
- Remittance of Unused Funds: Unused services fee assistance should be remitted to HUD when the EHV
 program ends. Effective processes should be in place to identify and remit any unused services fee funds.
- **Landlord Benefits:** The impact of services fees on landlords' participation in the EHV program should be monitored, tracking indicators like reduced rent defaults, minimal paperwork, and landlord satisfaction.
- **Security Deposit Caps:** Security deposit amounts funded by services fees must align with local laws and regulations, and consistency in assistance provided to EHV households should be verified.¹⁰

Common Monitoring Findings Related to the EHV Services Fee

HUD's Quality Assurance Division (QAD) and the EHV Research Team have commenced monitoring of the EHV program; below are some of the most common monitoring findings and recommendations specific to EHV services fees:

- ✓ Do not report the EHV services fee expenditures as part of admin expenses or HAP expenses— EHV services fee should be separate.
- ✓ Reporting of EHV services fees must be reported consistently and accurately in VMS.
- ✓ Do not use the EHV services fee to pay the tenant portion of the rent.
- ✓ Create a separate sub-ledger for EHV, so that the EHV services fee expenditures are not part of regular HCV expenses. PHAs should also be able to demonstrate where unearned services fees are held in their bank accounts and that there is a General Depository Agreement (GDA) in place.
- ✓ Revisit your Administrative Plan, and ensure eligible expenditures are properly adopted into the administrative plan. PHAs may only make service fee expenditures in line with the approved policy in the PHA Administrative Plan.
- ✓ Supporting documentation needs to be kept for all EHV services fee expenditures.
- ✓ Remaining EHV services fees held by the PHA are unearned revenue. They do not have an impact on the Restricted Net Position (RNP) since the cash is offset by the unearned revenue. However, PHAs are reminded that EHV Service Fee cash and investments are part of the overall EHV Program cash and investments reported in the VMS.

To ensure compliance with HUD's reporting requirements, please consult <u>HUD Notice PIH 2021-25 (HA)</u>: Emergency Housing Vouchers – Voucher Management System and Financial Data Schedule Reporting Requirements and the <u>VMS User's Manual</u>.

^{10.}U.S. Department of Housing and Urban Development. Common Monitoring Findings Related to the EHV Service Fee. https://www.hud.gov/program_offices/public_indian_housing/ehv/sfg.

HUD Notices and Guidance

For additional information on EHV operating requirements and services fees, please see the EHV Services Fee Guidance, Tips, and Resources page on the HUD website at <u>EHV Services Fee Guidance, Tips, and Resources</u>.

Please also see the following EHV resources linked below:

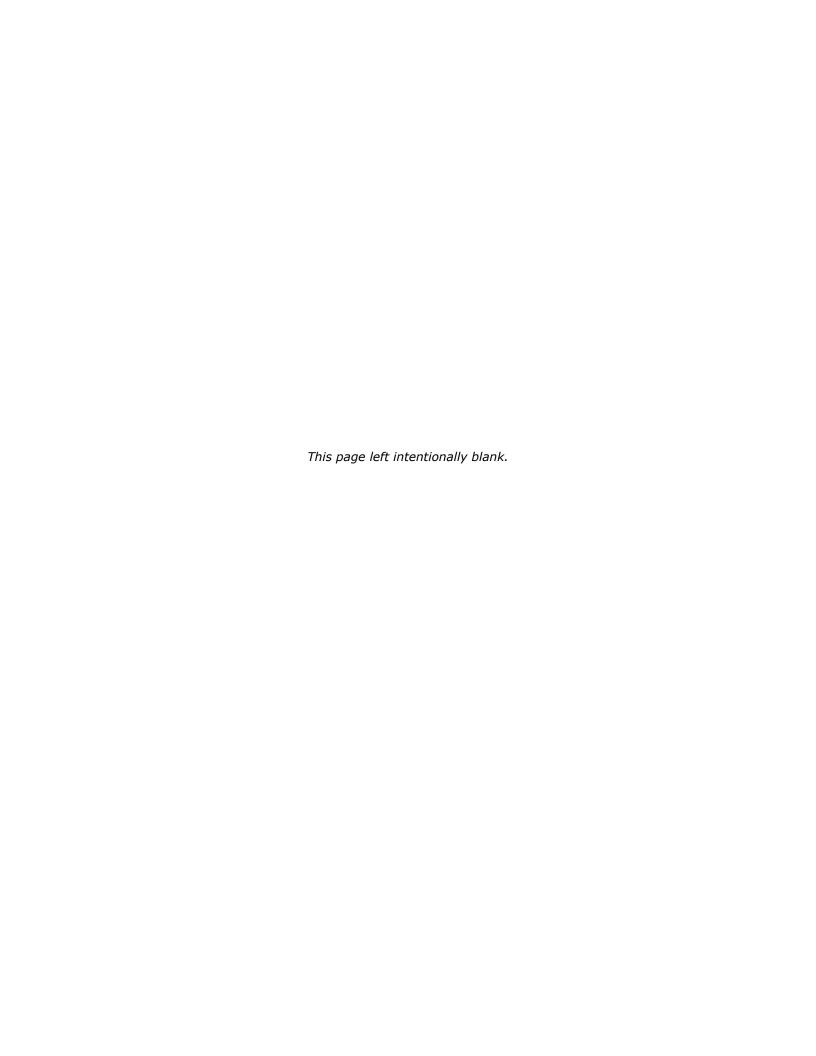
Resources

- Notice PIH 2021-15 (HA): Emergency Housing Vouchers Operating Requirements
- Notice PIH 2023-23 (HA): Emergency Housing Voucher (EHV): Expanded Use of the EHV Services Fee
- Notice PIH 2021-25 (HA): Emergency Housing Vouchers Voucher Management System and Financial Data Schedule Reporting Requirements
- Emergency Housing Vouchers: Frequently Asked Questions (FAQs), v.9
- Emergency Housing Vouchers: A How-To Guide for Public Housing Agencies
- Previously Held EHV Office Hours and Webinars

Training and Technical Assistance

Technical assistance and training can help address specific questions and challenges regarding EHV services fees, provide guidance on best practices, and ensure compliance with program requirements. If you require technical assistance related to the EHV program or services fees, please visit HUD Exchange at https://www.hudexchange.info/program-support/technical-assistance to request support.

^{11.} U.S. Department of Housing and Urban Development. EHV Service Fee Guidance, Tips, and Resources. Accessible at: https://www.hud.gov/program_offices/public_indian_housing/ehv/sfg.





APPENDIX

Table of Allowable Service Fee Expenditures



APPENDIX

Table of Allowable Service Fee Expenditures

The following table outlining allowable service fee expenditures has been copied from the Appendix of Notice PIH 2023-23 (HA). Please see notice for original version.

Service Fee Expenditure Type	Notice/Section	When Allowable	Acceptable Documentation
Housing Search Salaries/Benefits	Notice PIH 2021-15, Section 6(d)(i), as amended by: Notice PIH 2023-23, Section 4(i)	Staff allocated full time to the housing search process may have the full amount of their salaries/benefits charged to EHV Service Fees. This must be supported by position descriptions. Staff allocated less than full time to EHV must have the portion of their salaries/benefits supported by position descriptions and timecards showing the amount of time spent on housing search activities.	Position descriptions, allocation plan, timecards documenting time spent on EHV Service Fee Activities. Salary and benefit expenses must be recorded in the PHA's EHV subledger.
Housing Search Contracts	Notice PIH 2021- 15, Section 6(d)(i) as amended by: Notice PIH 2023-23, Section 4(i)	Contracts must be fully executed and approved before activities occur. Costs must be reasonable, and payment based upon the terms of the contract. PHAs must comply with their procurement policies in obtaining a housing search contract.	Bid packets, copies of contracts, and invoices. All payments to contractors must be recorded in the PHA's EHV subledger.
Application Fees	Notice PIH 2021-15, Section 6(d)(ii)(A) as amended by: Notice PIH 2023-23, Section 4(ii)(A)	Allowable at time of family application for the unit that the family wishes to rent. May be paid directly to the landlord by the PHA or reimbursed to the family.	Receipt from landlord for application fee. Payments to landlords must be recorded in the PHA's EHV subledger.
Non-Refundable Administrative or Processing Fees (Including Broker Fees)	Notice PIH 2021-15, Section 6(d)(ii)(A) as amended by: Notice PIH 2023-23, Section 4(ii)(A)	Allowable at the time that the family is required to pay fees for the unit that the family wishes to rent. May be paid directly to the landlord by the PHA or reimbursed to the family.	Receipt from the landlord/leasing company/broker. Payments to landlords, leasing companies, or brokers must be recorded in the PHA's EHV subledger.



Service Fee Expenditure Type	Notice/Section	When Allowable	Acceptable Documentation
Refundable Application Deposit Assistance	Notice PIH 2021-15, Section 6(d)(ii)(A) as amended by: Notice PIH 2023-23, Section 4(ii)(A)	Allowable at time of family application for the unit that the family wishes to rent. Funds returned to the EHV program constitute program income and must be used for permissible EHV service fee purposes.	Receipt from the landlord/leasing company. Payments to landlords or leasing companies must be recorded in the PHA's EHV subledger.
Holding Fees	Notice PIH 2021-15, Section 6(d)(ii)(B) as amended by: Notice PIH 2023-23, Section 4(ii)(B)	Allowable at time of family application for the unit that the family wishes to rent. Must be supported by a receipt from the landlord/leasing company. May be paid directly to the landlord by the PHA or reimbursed to the family.	Receipt from the landlord/leasing company. Payments to landlords or leasing companies must be recorded in the PHA's EHV subledger.
Security Deposit Assistance	Notice PIH 2021-15, Section 6(d)(ii)(C) as amended by: Notice PIH 2023-23, Section 4(ii)(C)	Allowable at the time that the family is required to pay the deposit for the unit that the family wishes to rent. The amount of the security deposit assistance may not exceed the lesser of two months' rent to owner, the maximum security deposit allowed under applicable state and/or local law, or the actual security deposit required by the owner. Funds returned to the EHV program constitute program income and must be used for permissible EHV service fee purposes. Note: PHAs are encouraged to consult with their counsel to determine whether local and State statutes regarding unclaimed property may apply and take precedence over the Notice. The Notice states that the PHA, "may place conditions on the security deposit assistance, such as requiring the owner or family to return the security deposit assistance to the PHA at the end of the family's tenancy (less any amounts retained by the owner in accordance with the lease or it may choose not to place those restrictions.	Receipt from the landlord/leasing company. Payments to landlords must be recorded in the PHA's EHV subledger.



Service Fee Expenditure Type	Notice/Section	When Allowable	Acceptable Documentation
Utility Deposit Assistance	Notice PIH 2021-15, Section 6(d)(ii)(D) as amended by: Notice PIH 2023-23, Section 4(ii)(D)	Allowable at the time that the family is required to pay fees for the unit that the family wishes to rent. Funds returned to the EHV program constitute program income and must be used for permissible EHV service fee purposes.	Receipt from the utility service. Payments to utilities or families must be recorded in the PHA's EHV subledger.
Utility Arrears	Notice PIH 2021-15, Section 6(d)(ii)(D) as amended by: Notice PIH 2023-23, Section 4(ii)(D)	Allowable at the time that the family is required to pay fees for the unit that the family wishes to rent.	Receipt from the utility service. Payments to utilities or families must be recorded in the PHA's EHV subledger.
Rental Arrears to Private Landlords	Notice PIH 2023-23, Section 4(ii)(E)	PHAs may pay private landlords for rental arrears <u>only</u> if the rental arrears present a barrier to leasing for the unit that the family wishes to rent. This may occur when a family previously rented from the landlord and accrued such arrears. Note: PHAs <i>may not</i> use any EHV Service Fees to pay <i>any</i> portion of a debt owed to a PHA or a non-profit closely associated with a PHA.	Receipt from the landlord/leasing company. Payments to landlords must be recorded in the PHA's EHV subledger.
Owner Recruitment Coordinator	Notice PIH 2021-15, Section 6(d)(iii)(A) as amended by: Notice PIH 2023-23, Section 4(iii)(A)	Staff allocated full time to the landlord recruitment process may have the full amount of their salaries/benefits charged to EHV Service Fees. Staff allocated less than full time to EHV must have the portion of their salaries/benefits supported by position descriptions and timecards showing the amount of time spent on housing search activities.	Position descriptions, allocation plan, timecards documenting time spent on EHV Service Fee Activities. Salary and benefit costs must be recorded in the PHA's EHV subledger.



Service Fee Expenditure Type	Notice/Section	When Allowable	Acceptable Documentation
Owner Incentive/ Retention Payments Owner Incentive to Make Interior/ Exterior Structural Modifications for Participants with Disabilities	Notice PIH 2021-15, Section 6(d)(iii)(B) as amended by: Notice PIH 2023-23, Section 4(iii)(B)	Allowable when lease/HAP Contract are signed. Costs must be necessary and reasonable to secure affordable units for EHV Participants. Costs must be clearly defined in the PHA Administrative Plan. Incentive/retention payments cannot be made in a way that violates (or clearly circumvents) applicable statutory or regulatory requirements, so making owner incentive payments on an ongoing monthly basis would not be permissible.	Payments to Owners must be recorded in the PHA's EHV subledger.
Moving Expenses, Storage Expenses, and Lock Change Fees	Notice PIH 2021-15, Section 6(d)(iv)(A) as amended by: Notice PIH 2023-23, Section 4(iv)(A)	Allowable at the time that the family is required to pay fees for the unit that the family wishes to rent. Costs must be necessary and reasonable. The PHA may not provide moving expenses assistance for subsequent moves unless the family is required to move for reasons other than something the family did or failed to do (e.g., the PHA is terminating the HAP contract because the owner did not fulfill the owner responsibilities under the HAP contract or the owner is refusing to offer the family the opportunity to enter a new lease after the initial lease term, as opposed to the family choosing to terminate the tenancy in order to move to another unit), or a family has to move due to domestic violence, dating violence, sexual assault, or stalking. May be paid directly to the moving company by the PHA or reimbursed to the family. Lock change fees may be paid directly to the landlord.	Receipts/paid invoices. Payments to moving companies, landlords, storage companies, or participants must be recorded in the PHA's EHV subledger.
Move-in Fees/Deposits	Notice PIH 2021-15, Section 6(d)(iv)(A) as amended by: Notice PIH 2023-23, Section 4(iv)(A)	Payable once EHV family moves into the unit for the unit that the family wishes to rent. Must be supported by receipts and costs must be necessary and reasonable. May be paid directly to the landlord by the PHA or reimbursed to the family.	Receipt from landlord. Payments to landlords must be recorded in the PHA's EHV subledger.



Service Fee Expenditure Type	Notice/Section	When Allowable	Acceptable Documentation
Pre-Tenancy Services Services that support EHV families in fulfilling their family obligations under the EHV program Participant Vital Documents	Notice PIH 2021-15, Section 6(d)(iv)(B) as amended by: Notice PIH 2023-23, Section 4(i)	Must be supported by invoices and/or contract. Costs must be necessary and reasonable. Costs may not include payments for rental arrears. PHAs must comply with their procurement policies in obtaining a housing search contract. PHAs may use EHV Service Fee funding to pay for necessary and reasonable services to obtain and maintain occupancy of a unit with EHV assistance. This may include services for: customized plans to address or mitigate barriers that families may face renting a unit (e.g., negative credit, lack of credit, negative rental or utility history, or to connect the family to other community resources (including COVID-related resources) that can assist with rental arrears. case management, wrap-around services, stability coordinators, life skills training (e.g., balancing a budget, paying bills on time, opening a savings account, maintaining a living space, securing a credit card, paying off debt, etc.), financial stability training, mental health care (e.g., access to counseling, travel costs to counseling, and co-pay charge, etc.), hiring/contracting a stability coordinator, providing services to remedy a lease violation/eviction and may establish a cap/threshold for this service (e.g., cleaning service/trash removal for rectifying unsanitary living conditions or property damage; this excludes rental arrears).	Bid packets, copies of contracts, and invoices. All payments to contractors must be recorded in the PHA's EHV subledger. Salary and benefit expenses must be recorded in the PHA's EHV subledger. Copies of receipts/invoices for services rendered to help families meet their obligations under the EHV program. If services are centrally contracted, bid packets, copies of contracts, and invoices. All payments to contractors must be recorded in the PHA's EHV subledger. Salary and benefit expenses must be recorded in the PHA's EHV subledger. Copies of receipts for the vital documents. The PHA must record these payments in the PHA's EHV subledger.



Service Fee Expenditure Type	Notice/Section	When Allowable	Acceptable Documentation
Pre-Tenancy Services Services that support EHV families in fulfilling their family obligations under the EHV program Participant Vital Documents	Notice PIH 2021-15, Section 6(d)(iv)(B) as amended by: Notice PIH 2023-23, Section 4(i)	All services and training provided must be voluntary for the family and cannot be a condition of the lease or a PHA requirement for admission or continued participation in the EHV program. PHAs may pay fees for families to obtain vital documents needed to establish eligibility for the program. This can include application fees and costs for birth certificates and state- issued ID, reasonable transportation costs to obtain Social Security cards or other documentation needed for eligibility. This activity must be properly added to the PHA's Administrative Plan. The PHA may reimburse the family once paid or pay the cost directly.	Bid packets, copies of contracts, and invoices. All payments to contractors must be recorded in the PHA's EHV subledger. Salary and benefit expenses must be recorded in the PHA's EHV subledger. Copies of receipts/invoices for services rendered to help families meet their obligations under the EHV program. If services are centrally contracted, bid packets, copies of contracts, and invoices. All payments to contractors must be recorded in the PHA's EHV subledger. Salary and benefit expenses must be recorded in the PHA's EHV subledger. Copies of receipts for the vital documents. The PHA must record these payments in the PHA's EHV subledger.
Essential Household Items	Notice PIH 2021-15, Section 6(d)(iv)(D) as amended by: Notice PIH 2023-23, Section 6(d)(iv)(D	Reimbursed to family once paid for the unit that the family wishes to rent. Family responsible for identifying and obtaining insurance. PHAs may not steer families toward any particular company but may provide a listing of companies that provide insurance in the PHA'As jurisdiction.	Copy of receipt from family/insurance company. Payments to participants/ insurance companies must be recorded in the PHA's EHV subledger.
Renter's Insurance If Required By The Lease	Notice PIH 2021-15, Section 6(d)(iv)(D) as amended by: Notice PIH 2023-23, Section 6(d)(iv)(D	Reimbursed to family once paid for the unit that the family wishes to rent. Family responsible for identifying and obtaining insurance. PHAs may not steer families toward any particular company but may provide a listing of companies that provide insurance in the PHA'As jurisdiction.	Copy of receipt from family/insurance company. Payments to participants/ insurance companies must be recorded in the PHA's EHV subledger.