

Emergency Rental Assistance Program
Housing Stability Services
Policies & Procedures
Department for Children & Families
Department of Housing & Community Development

OVERVIEW

The US Treasury has made available funds for the Emergency Rental Assistance Program (ERAP) to assist eligible households who are otherwise unable to pay rent and utilities due to the COVID-19 pandemic.¹ Ten percent of funds may be used to support housing stability services, including case management and other services intended to keep households stably housed.² As part of Vermont's Emergency Rental Assistance Program (VERAP), the Vermont State Housing Authority, the Department for Children and Families Economic Services Division, and the Department of Public Service will implement programs to provide rental and other allowable financial assistance to eligible households.

The Vermont Department for Children and Families Office of Economic Opportunity (DCF-OEO) and the Department of Housing and Community Development (DHCD) also administer ERAP Housing Stability Services Programs. The Departments jointly issued a Notice of Funding and Application in April 2021 and March 2022 providing a basic overview of objectives, funding sources, eligible applicants, eligible activities and eligible households.

Since April, the U.S. Treasury has issued additional guidance, clarifications and reporting requirements. The [Treasury FAQ \(Revised June 24, 2021\)](#) provides the following examples of housing stability services:

Housing stability services include those that enable eligible households to maintain or obtain housing. Such services may include, among other things, eviction prevention and eviction diversion programs; mediation between landlords and tenants; housing counseling; fair housing counseling; housing navigators or promotoras that help households access ERA programs or find housing; case management related to housing stability; housing-related services for survivors of domestic abuse or human trafficking; legal services or attorney's fees related to eviction proceedings and maintaining housing stability; and specialized services for individuals with disabilities or seniors that support their ability to access or maintain housing. Grantees using ERA funds for housing stability services must maintain records regarding such services and the amount of funds provided to them.

This FAQ also specifically encourages housing stability services to be used to help households without housing to identify housing that meets their needs (FAQ. #35), encourages partnerships with courts to

¹ <https://home.treasury.gov/policy-issues/cares/emergency-rental-assistance-program>

² ERAP Treasury Guidance, FAQ #23, Pg. 13, [ERA FAQs 6-24-21.pdf \(treasury.gov\)](#)

prevent eviction and deploy housing stability services to assist households facing evictions (FAQ. #36) and promote cultural and linguistic access through housing stability services (FAQ. #37).

This document provides supplemental information and outlines policies and procedures for the delivery of Housing Stability Services.

Funds are being made available as part of the Emergency Rental Assistance Program, CFDA 21.023, and the Emergency Rental Assistance Program 2, CFDA 21.023. The Emergency Rental Assistance Program was established under the Consolidated Appropriations Act, 2021 (Pub. L. No. 116-260). All funds will be subject to requirements set forth by the U.S. Treasury. Funds under ERA 1 expire on September 30, 2022,³ pursuant to statute. The Emergency Rental Assistance Program 2 was established under the American Rescue Plan Act of 2021 (Pub. L. No. 117-2). Funds expire on September 30, 2025. All funds will be subject to requirements set forth by the U.S. Treasury.

- Emergency Rental Assistance Program [Statutory provisions](#)
- Emergency Rental Assistance Program 2 [Statutory provisions](#)
- [FAQ regarding the Emergency Rental Assistance Program](#) (published 8/25/2021)

HOUSING STABILITY SERVICES ACTIVITIES

Housing Stability Services activities include the following:

- 1) Outreach** to targeted communities to ensure information about the VT Emergency Rental Assistance Program (VERAP) is getting to eligible households.
- 2) Application Assistance** to households to complete the VERAP application and recertification process.
- 3) Housing Navigation Services⁴** to provide logistical and housing support to households.
 - Identify housing barriers, needs/preferences, and explore resources and opportunities within a household's natural support network;
 - Work to address barriers to project/housing admissions (e.g., criminal record, credit report, utility arrears, unfavorable references);
 - Develop an action plan for locating housing, and support housing search and placement;
 - Provide outreach and negotiate with landlords;
 - Work closely with housing providers regarding eligibility documentation and verification;
 - Follow-up on referrals to housing to support enrollment;
 - Assist with submitting rental/housing applications and understanding leases;
 - Ensure the living environment is safe and ready for move-in (facilitate inspections);
 - Support compliance with fair market rent and rent reasonableness, if applicable;
 - Assist in arranging for/supporting move (set up utilities, moving arrangements, etc.);
 - Find resources to support move-in (security deposit, moving costs, furnishings, costs to support home-sharing, other one-time costs);
 - Provide education and training on the role, rights, and responsibilities of the tenant and landlord;

³ Grantee Award Terms ERA1, Pg. 2, [Emergency-rental-assistance-terms-FINAL.pdf \(treasury.gov\)](#)

⁴ DCF definition of Housing Navigation Services

- Develop a housing support crisis plan that includes early prevention/intervention when housing is jeopardized; and
 - Identify other service needs/ongoing retention support needs and connect client to mainstream services and benefits.
- 4) **Housing Retention Services**⁵ to provide ongoing, individualized support and coordination for households once stabilized in permanent housing.
- Provide early identification and intervention for behaviors that may jeopardize housing, such as late rental payment and other lease violations;
 - Coach on developing and maintaining key relationships with landlords/property managers with a goal of fostering successful tenancy;
 - Assist in resolving disputes with landlords and/or neighbors to reduce risk of eviction or other adverse action;
 - Advocate and link with community resources to prevent eviction when housing is, or may potentially become jeopardized;
 - Assist with the housing recertification process;
 - Coordinate with the tenant to review, update and modify their housing support and crisis plan on a regular basis to reflect current needs and address existing or recurring housing retention barriers;
 - Continue training in being a good tenant and lease compliance, including ongoing support with activities related to household management; and,
 - Connect the household to mainstream services and benefits.
- 5) **Landlord Outreach & Education** through projects that serve a regional, or otherwise defined community, and are dedicated to ensuring landlords are aware of ERAP resources and assist landlords through the application process.
- 6) **Landlord-Tenant Mediation** is formal mediation services available to landlords and tenants to resolve conflicts and avoid evictions.
- 7) **Legal Services** to resolve legal problems related to obtaining/maintaining permanent housing.
- 8) **Credit repair/Money Management** services related to obtaining/maintaining permanent housing.
- 9) **Other Innovative Services**

In some cases, a household may only receive one type of service; in other cases, a household may receive many types of services.

⁵ DCF definition of Housing Retention Services

ELIGIBLE HOUSEHOLDS

Households eligible for ERAP have or will have a rental obligation, and one or more individuals in the household:

- Has qualified for unemployment benefits or experienced a reduction in household income, incurred significant costs, or experienced other financial hardship due, directly or indirectly, to the COVID-19 outbreak;
- Can demonstrate a risk of experiencing homelessness or housing instability; and
- Has a household income at or below 80% of area median income.

Housing Stability Services administered by DCF-OEO and DHCD are part of Vermont's Emergency Rental Assistance Program.

ELIGIBILITY DETERMINATION

ERAP Housing Stability Service Agencies are required to determine and document eligibility for households receiving services as outlined below.

| Type of Activity | Eligibility Determination |
|--|--|
| Outreach | When this is the only or initial service provided, no additional eligibility determination is required. It is assumed that the household eligibility determination will occur during the ERA application process for financial assistance. |
| Application and Recertification Assistance | |
| Landlord Outreach, Education, and Application Assistance | When this is the only or initial service provided, no additional eligibility determination is required. |
| Landlord-Tenant Mediation Services | Housing Stability Service Providers are required to determine and document eligibility for ERAP Housing Stability Services (see Appendices 1 and 2). These households are then considered <i>enrolled</i> in ERAP Housing Stability Services. |
| Housing Navigation Services | |
| Housing Retention Services | |
| Legal Services | |
| Credit Repair/Money Management | |
| Other Innovative Services | DCF-OEO and DHCD will work with Innovative Services Providers on a case by case basis to decide how best to determine and document eligibility. |

REPORTING & PERFORMANCE MEASUREMENT

All Housing Stability Services Providers will report on households served during the reporting period, including demographic data for enrolled households and performance measures, including a narrative, tailored to the activities provided under their grant or contract with DHCD and DCF. Reports are due quarterly and require deduplicated totals for the program period to date for each submission.

Total Served

- Total # of unique/unduplicated households served during the reporting period
 - #/% of households experiencing homelessness
- Demographic data for unique/unduplicated households (primary applicant) served during the reporting period (enrolled households only)
 - Primary Applicant Gender
 - Primary Applicant Race
 - Primary Applicant Ethnicity
 - Income Category of Household
 - < 30% of HUD area median income (AMI)
 - >= 30% HUD AMI and <= 50% HUD AMI
 - >50% HUD AMI and <= 80% HUD AMI

Outreach

- Type of outreach service, and # of efforts
- # of households reached

Application Assistance

- # of households assisted
- # of landlords assisted

Housing Navigation Services

- # of households served
 - #/% of households experiencing homelessness
- #/% households rehoused

Housing Retention Services

- # of households served
 - #/% of households experiencing homelessness prior to being housed
- #/% households who maintained housing

Landlord Outreach and Education

- # of landlords contacted
- # of unique contacts with landlords (email, phone, face-to-face)

Landlord-Tenant Mediation

- # of inquiries received

- # of applications received
 - #/% of applications referred to mediator
 - #/% of mediations completed

Legal Services

- # of residential eviction cases filed in court
 - #/% receiving outreach (call, text, letter)
- # of households served by initial legal consultation (not enrolled)
- # of households provided legal representation (enrolled in legal services)
 - # of cases
 - #/% cases in which tenant defeated or successfully compromised claim for immediate possession at the time the case closed with provider
 - #/% cases in which tenant defeated, reduced, or compromised landlord’s claim for rent at the time case closed with provider

Credit Repair/Money Management

- # of households served
 - #/% of households experiencing homelessness

*Performance measures for Other Innovative Services will be developed as necessary.

RECORDKEEPING

Housing Stability Service Providers are required to maintain information about eligibility and services provided for a minimum of (5) five years after the Emergency Rental Assistance Program ends and all funds are expended.

AGENCY POLICIES

Housing Stability Service Providers are required to adhere to expectations identified in the grant agreements, including Attachment C: Standard State Provisions for Contacts and Grants and Attachment F: Agency of Human Services’ Customary Contract/Grant Provisions. Providers may leverage existing agency policies to meet these requirements. During the course of Programmatic Monitoring, Housing Stability Services Providers may be asked to provide policies addressing these requirements. This may include, but is not limited to, policies addressing:

- 1) Confidentiality
- 2) Involuntary Termination of Services, including a Grievance/Appeals Process

APPENDIX 1: ELIGIBILITY DETERMINATION FORM FOR ERAP HOUSING STABILITY SERVICES

| Household Members (Please list all) | Relationship to Applicant |
|-------------------------------------|---------------------------------|
| | <i>Self (Primary Applicant)</i> |
| | |
| | |
| | |

Current Physical Address: _____

Town/City: _____ **Zip Code:** _____ **County:** _____

- At least one member of my household has experienced some financial hardship due, directly or indirectly, to the COVID-19 pandemic. This includes qualifying for unemployment or experiencing the loss of income, increased expenses, or an inability to find or keep a job due to the COVID-19 pandemic.
- My household is at risk of housing instability, is currently experiencing homelessness or may become homeless.
- In the past 30 days my household's income was: _____ OR my household's income was: _____ (this may be 2020 or 2021). This includes income received by anyone in the household (including children). This also includes wages from jobs, child support, SSI/SSDI, Unemployment, Veteran's Benefits, Reach Up, Social Security, Pension or Retirement Income, or other cash income.
- I understand that my information as provided on this form may be shared with other Vermont state agencies, and other Vermont agencies can share information with the entity administering my housing stability services for the purpose of verifying my household's eligibility for this or other services related to the COVID-19 pandemic. Information, as provided on this form, will be shared with the Agency of Human Services, Agency of Commerce and Community Development, and the Agency of Administration to be used for State of Vermont reporting to the U.S. Department of the Treasury.
- I understand that if Federal guidance on the regulations of the Emergency Rental Assistance Program changes, it may change the terms of this program.

I certify that the information in this application is complete and true to the best of my knowledge.

Applicant Signature*: _____ **Date:** _____

Staff Signature: _____ **Date:** _____

**If the applicant is unable to sign the application, they may provide verbal authorization for the Housing Stability Services provider to sign on their behalf. In these cases, staff shall print the Applicant's name in place of signature, make a notation below, and staff signature is still required.*

- On (date) _____ the Applicant and I reviewed the application and the Applicant authorized me to sign on their behalf.

APPENDIX 2: INCOME ELIGIBILITY DETERMINATION

Total Persons in Household _____ Total Annual Household Income _____

| County | % Median Income | TOTAL HOUSEHOLD MEMBERS | | | | | | | |
|-------------------|-----------------|-------------------------|----------|----------|----------|----------|----------|----------|-----------|
| | | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 |
| Addison County | 30% | \$17,600 | \$20,100 | \$22,600 | \$25,100 | \$27,150 | \$29,150 | \$31,150 | \$33,150 |
| | 50% | \$29,333 | \$33,500 | \$37,667 | \$41,833 | \$45,250 | \$48,583 | \$51,917 | \$55,250 |
| | 80% | \$46,900 | \$53,600 | \$60,300 | \$66,950 | \$72,350 | \$77,700 | \$83,050 | \$88,400 |
| Bennington County | 30% | \$16,450 | \$18,800 | \$21,150 | \$23,500 | \$25,400 | \$27,300 | \$29,150 | \$31,050 |
| | 50% | \$27,417 | \$31,333 | \$35,250 | \$39,167 | \$42,333 | \$45,500 | \$48,583 | \$51,750 |
| | 80% | \$43,900 | \$50,150 | \$56,400 | \$62,650 | \$67,700 | \$72,700 | \$77,700 | \$82,700 |
| Caledonia County | 30% | \$16,450 | \$18,800 | \$21,150 | \$23,500 | \$25,400 | \$27,300 | \$29,150 | \$31,050 |
| | 50% | \$27,417 | \$31,333 | \$35,250 | \$39,167 | \$42,333 | \$45,500 | \$48,583 | \$51,750 |
| | 80% | \$43,900 | \$50,150 | \$56,400 | \$62,650 | \$67,700 | \$72,700 | \$77,700 | \$82,700 |
| Chittenden County | 30% | \$20,150 | \$23,000 | \$25,900 | \$28,750 | \$31,050 | \$33,350 | \$35,650 | \$37,950 |
| | 50% | \$33,583 | \$38,333 | \$43,167 | \$47,917 | \$51,750 | \$55,583 | \$59,417 | \$63,250 |
| | 80% | \$53,700 | \$61,400 | \$69,050 | \$76,700 | \$82,850 | \$89,000 | \$95,150 | \$101,250 |
| Essex County | 30% | \$16,450 | \$18,800 | \$21,150 | \$23,500 | \$25,400 | \$27,300 | \$29,150 | \$31,050 |
| | 50% | \$27,417 | \$31,333 | \$35,250 | \$39,167 | \$42,333 | \$45,500 | \$48,583 | \$51,750 |
| | 80% | \$43,900 | \$50,150 | \$56,400 | \$62,650 | \$67,700 | \$72,700 | \$77,700 | \$82,700 |
| Franklin County | 30% | \$20,150 | \$23,000 | \$25,900 | \$28,750 | \$31,050 | \$33,350 | \$35,650 | \$37,950 |
| | 50% | \$33,583 | \$38,333 | \$43,167 | \$47,917 | \$51,750 | \$55,583 | \$59,417 | \$63,250 |
| | 80% | \$53,700 | \$61,400 | \$69,050 | \$76,700 | \$82,850 | \$89,000 | \$95,150 | \$101,250 |
| Grand Isle County | 30% | \$20,150 | \$23,000 | \$25,900 | \$28,750 | \$31,050 | \$33,350 | \$35,650 | \$37,950 |
| | 50% | \$33,583 | \$38,333 | \$43,167 | \$47,917 | \$51,750 | \$55,583 | \$59,417 | \$63,250 |
| | 80% | \$53,700 | \$61,400 | \$69,050 | \$76,700 | \$82,850 | \$89,000 | \$95,150 | \$101,250 |
| Lamoille County | 30% | \$16,450 | \$18,800 | \$21,150 | \$23,500 | \$25,400 | \$27,300 | \$29,150 | \$31,050 |
| | 50% | \$27,417 | \$31,333 | \$35,250 | \$39,167 | \$42,333 | \$45,500 | \$48,583 | \$51,750 |
| | 80% | \$43,900 | \$50,150 | \$56,400 | \$62,650 | \$67,700 | \$72,700 | \$77,700 | \$82,700 |
| Orange County | 30% | \$16,450 | \$18,800 | \$21,150 | \$23,500 | \$25,400 | \$27,300 | \$29,150 | \$31,050 |
| | 50% | \$27,417 | \$31,333 | \$35,250 | \$39,167 | \$42,333 | \$45,500 | \$48,583 | \$51,750 |
| | 80% | \$43,900 | \$50,150 | \$56,400 | \$62,650 | \$67,700 | \$72,700 | \$77,700 | \$82,700 |
| Orleans County | 30% | \$16,450 | \$18,800 | \$21,150 | \$23,500 | \$25,400 | \$27,300 | \$29,150 | \$31,050 |
| | 50% | \$27,417 | \$31,333 | \$35,250 | \$39,167 | \$42,333 | \$45,500 | \$48,583 | \$51,750 |
| | 80% | \$43,900 | \$50,150 | \$56,400 | \$62,650 | \$67,700 | \$72,700 | \$77,700 | \$82,700 |
| Rutland County | 30% | \$16,450 | \$18,800 | \$21,150 | \$23,500 | \$25,400 | \$27,300 | \$29,150 | \$31,050 |
| | 50% | \$27,417 | \$31,333 | \$35,250 | \$39,167 | \$42,333 | \$45,500 | \$48,583 | \$51,750 |
| | 80% | \$43,900 | \$50,150 | \$56,400 | \$62,650 | \$67,700 | \$72,700 | \$77,700 | \$82,700 |
| Washington County | 30% | \$17,300 | \$19,750 | \$22,200 | \$24,650 | \$26,650 | \$28,600 | \$30,600 | \$32,550 |
| | 50% | \$28,833 | \$32,917 | \$37,000 | \$41,083 | \$44,417 | \$47,667 | \$51,000 | \$54,250 |
| | 80% | \$46,050 | \$52,600 | \$59,200 | \$65,750 | \$71,050 | \$76,300 | \$81,550 | \$86,800 |
| Windham County | 30% | \$16,450 | \$18,800 | \$21,150 | \$23,500 | \$25,400 | \$27,300 | \$29,150 | \$31,050 |
| | 50% | \$27,417 | \$31,333 | \$35,250 | \$39,167 | \$42,333 | \$45,500 | \$48,583 | \$51,750 |
| | 80% | \$43,900 | \$50,150 | \$56,400 | \$62,650 | \$67,700 | \$72,700 | \$77,700 | \$82,700 |
| Windsor County | 30% | \$16,600 | \$18,950 | \$21,300 | \$23,650 | \$25,550 | \$27,450 | \$29,350 | \$31,250 |
| | 50% | \$27,667 | \$31,583 | \$35,500 | \$39,417 | \$42,583 | \$45,750 | \$48,917 | \$52,083 |
| | 80% | \$44,150 | \$50,450 | \$56,750 | \$63,050 | \$68,100 | \$73,150 | \$78,200 | \$83,250 |

All households must have income at or below 80% of area median income.

Income Category of Household (check one):

- < 30% of HUD AMI
 >=30% and <= 50% HUD AMI
 >50% and <= 80% HUD AMI