

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, the Vermont State Housing Authority, the Department for Children and Families Economic Services Division, and Department of Public Service will implement programs to provide rental and other allowable financial assistance to eligible households.

The Vermont Department of 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 which provides 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 promoters 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. 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, 2022³ pursuant to statute.

HOUSING STABILITY SERVICES ACTIVITIES

DHCD and DCF-OEO have awarded funds to eligible organizations (i.e., ERAP Housing Stability Service Providers) in Vermont to provide a range of activities defined and further described in the Notice of Funding:

- Outreach to eligible Vermont households, with particular attention to reaching marginalized populations such as extremely low-income Vermonters, persons with limited English proficiency, as well as black, indigenous and people of color (BIPOC), people living with a disability, etc.;
- Additional direct services support, where needed, to provide 1:1 application and recertification assistance to eligible households;
- Landlord-Tenant Mediation Services;
- Landlord Outreach and Education;
- Housing Navigation Services to help eligible households transition into new housing (also referred to as Housing Search and Placement);
- Housing Stability Case Management;
- Legal Services; and
- Other Innovative Activities, as allowable under federal guidance, to support housing stability and achieve the goals of the Emergency Rental Assistance Program.

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

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

ELIGIBLE HOUSEHOLDS

Eligible households 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 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
- the household 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 and must be provided to identify and support households who are applying for Emergency Rental Assistance Program (ERAP) financial assistance, as well as support households that have already been determined eligible for ERAP financial assistance and have or will receive ERAP financial assistance.

ELIGIBILITY DETERMINATION

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

Type of Service	Eligibility Determination
Outreach Services, including basic screening and referral for financial assistance	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 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 considered <i>enrolled</i> in ERAP Housing Stability Services and should be included in Utilization & Demographic Reports.
Housing Navigation Services	
Housing Stability Case Management	
Legal Services	

DATA COLLECTION & UTILIZATION REPORTING REQUIREMENTS

Housing Stability Service Agencies are also required to report on utilization and demographics for enrolled households only. Program Utilization and Demographic reports are due monthly.

Utilization and Demographic Reports include the following data items for all households served during the reporting period, for each reporting period service is provided (not just at the time of enrollment):

- Primary Applicant First and Last Name
- Primary Applicant Date of Birth
- Primary Applicant Gender
- Primary Applicant Race
- Primary Applicant Ethnicity
- Zip Code (at time of enrollment)
- 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

DCF-OEO and DHCD will provide a reporting form.

Utilization and Demographic Reports include household level information only to facilitate a statewide, unduplicated count of ERAP participants, as required by the U.S. Treasury. The information in the Utilization and Demographic Reports is considered **Personally Identifiable Information (PII)**. This information and these reports are confidential. All Housing Stability Service Providers are reminded that Federal Uniform Guidance 2 CFR § 200.203 requires all recipients and sub-recipients of Federal Funds (including ERAP funds) to take reasonable measures to safeguard protected PII as defined by applicable Federal, State, and local laws. The Agency of Human Services on Information Technology and Electronic Communication can be found here: <https://humanservices.vermont.gov/rules-policies>

A designated email will be provided for submission of reports. All electronic sharing of Utilization and Demographic Reports MUST be sent securely via encryption.

PERFORMANCE MEASUREMENT & REPORTING

In addition, all Housing Stability Services Providers will report on performance measures tailored to the activities provided under their grant or contract with DHCD and DCF. Performance reports are due quarterly.

Total Served

- Total # of unique/unduplicated households served during the reporting period

Outreach Services to eligible Vermont households

- A description of outreach services, including # and type of outreach efforts
- # of households served

Landlord-tenant mediation services

- # of landlord/tenant mediations in which we provided representation to the tenant
- #/% of mediated court cases
- #/% cases mediated prior to court filing

Landlord-outreach and education

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

Housing Search and Placement Services

- # of households served
- #/% households rehoused in stable housing

Housing Stability Case Management

- # of households served
- #/% households who maintained stable housing (current on rent, no lease violations)

Legal Services

- # of households served by initial (phone) consultation
- #/% of court cases reviewed in an effort to contact the defendants
 - #/% receiving outreach (call, text, letter)
 - #/% enrolled/received legal services
 - #/% cases dismissed

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.

APPENDIX 1: ELIGIBILITY DETERMINATION FORM FOR ERAP HOUSING STABILITY SERVICES

Household Members	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 2020 income was: _____. 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 change, 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