

FAQ
Training #2 CRF Guidance: Rent/Mortgage Assistance and More
July 29, 2020

Q. Where can we find a list of FHFC properties that are eligible to receive CRF funds?

A. See the Shimberg Center's Assisted Housing Inventory -
<http://flhousingdata.shimberg.ufl.edu/assisted-housing-inventory>

Q. I have updated our contact information and program information and still get notified every day that I have to re-enter it.

A. If you are unsuccessful in updating the information online, please email
terry.auringer@floridahousing.org for assistance.

Q. Our LG has been inundated since the FHFC announcement about CRF funds. Can we use these inquiries as a first come, first serve list to distribute these funds? Once we advertise on our website most of these people have already contacted us, is it expected that they contact us again?

A. If you have established a waiting list of individuals that have contacted you for CRF assistance you can use this list as the first clients to be served under the program. Anyone that applies after you advertise would be added to this list.

Q. Just to clarify, does the renter/homeowner have to sign the intake form, as well as staff from the local government? Or are these separate documents, one signed by the affected renter/homeowner and one by staff?

A. The sample documents provided do not include a signature by LG staff, but these forms are only examples and can be modified by the local government. The Resident Income Certification should be signed by staff when completed.

Q. If providing assistance to a household with a SHIP mortgage - does it have to be the first mortgage, or can we assist if the SHIP mortgage is a second mortgage?

A. You can pay a SHIP mortgage in any position, including a first mortgage for an eligible applicant.

Q. Do applicants have to show proof that they are delinquent on their rent or mortgage?

A. An applicant does not have to be delinquent but they need to show proof of a negative impact due to COVID-19 to receive assistance.

Q. How can a local government document underemployment?

A. A local government can document underemployment by demonstrating that an applicant is receiving unemployment benefits, request a letter or e-mail from the employer stating that the applicant is no longer employed, has been furloughed, or seen a reduction in hours, or other method. The applicant can self-certify their hardship.

Q. Can local policies (such as self-certification) be more restrictive than what FHFC has allowed?

A. Yes, a LG can establish more restrictive policies than what is allowed by FHFC. FHFC has designed this program to provide maximum flexibility to local governments in deploying these funds quickly and effectively.

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Q. Are we reporting on contracts with contractors on FSRS for compliance with the Transparency Act?

A. No. Under the Federal Funding Accountability and Transparency Act (FFATA), only prime grant awardees (here, FHFC) are responsible for reporting on sub-awards through FSRS. Local governments will need to report all applicable information with FHFC, but are not required to submit through FSRS.

Q. Can local governments reimburse CSBG or other grant funds that helped with rentals on COVID related events?

A. Yes, as long as other funding sources do not prevent reimbursement and the amounts being reimbursed are for CRF eligible expenses for eligible applicants.

Q. Is a NOFA required for the new funds to be expended and what is the timeline for release of funds?

Funds should be released to local governments soon after the local government executes the funding agreement. Follow the advertising requirements in section C (6) of the subrecipient agreement and the clarification in the technical guidance provided on July 28. This guidance states “With the need to make the CRF funds available as soon as possible, the advertising requirement may also be met through the use of the local government’s website and social media accounts that are available to the public. Local governments that were already using SHIP funds for similar uses do not need to wait the 10-day period before taking applications.”

Q. Does the LHAP have to be amended to reflect up to 120% AMI? Is it a technical revision or is a full amendment?

A. These are not SHIP funds. They are not governed by the LHAP.

Q. Are we able to move Emergency Rental & Utility Assistance Applications currently in process to the CRF funding source?

Yes, or you can use SHIP funds to pay for the activity and when you receive the CRF funds, reimburse the program.

Q. Should we create a new application or use the one from FHC?

A. You can use any application you choose as long as it contains all the required elements of the FHFC funding agreement. FHC's sample agreement contains all the basic requirements.

Q. Does 2 CFR 200 apply?

A. Yes, refer to section L of the subrecipient agreement.

Q. Income verification - Are we going to be required to collect proof of income after executive order expires?

A. The self-certification form is sufficient evidence for the CRF program. No additional follow-up is required.

Q. Must we get verifications for assets?

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A. Each household members will self-certify their assets. You are not required to obtain third party verifications.

Q. Do I have to collect multiple ID's for household members or is one form of identification for each household member sufficient?

A. One form of ID for each household member is sufficient.

Q. We are electing to have a minor inspection completed to make sure the household is not living in a substandard unit. The inspection report is completed by landlord and signed off by tenant. From what we can see this is not required, it is a government decision. What are your thoughts?

A. An inspection is not technically required but CRF assistance can only be provided to “eligible housing” as defined by the FHFC funding agreement. A housing unit is only “eligible” if it is “designed and intended for the primary purpose of providing decent, safe, and sanitary residential [housing] that [is] designed to meet the standards of the Florida Building Code or previous building codes adopted under Chapter 553, Fla. Stat.” Therefore, if there is a question about the safety of a unit, it is a good idea to conduct an inspection if you have the staffing and can do so without slowing down assistance.

Q. If late fees have occurred on rent can we pay the late fees?

A. Yes, the payment of late fees is an eligible expense.

Q. Will the self-cert need to be notarized, or may it be witnessed by staff of the Subrecipient?

A. It can be notarized or witnessed.

Q. Do income-related documents need to be signed by all adult household members?

A. The self-certification has to be signed by each household member. The resident income certification can be signed by SHIP staff based on the information provided on the self-certification. The applicant can sign or confirm by e-mail that the information is correct.

Q. Can rent paid in mid-December for a rental period through January 14th be paid?

A. No. Rent cannot be paid beyond the month of December 30, 2020. However, partial rent can be paid from December 15 to December 30, 2020, for example.

Q. Could a local government pay someone's back due rent using DEM CARES funding, then pay their future rent through December 30 using SHIP-CRF?

A. Yes, if you do not duplicate benefits for any given month.

Q. I understand households assisted must be at or below 120% of the AMI. I've been asked if we can offer to households 50% or lower to get it out to those more in need.

A. Yes, you can set lower income limits for your program. That is a local policy decision.

Q. Do we need to keep our payments for rent and mortgage in separate expense accounts for reporting purposes?

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A. You will need to track payments to each individual household who receive assistance under the program.

Q. Can you go over again what will be the minimum advertisement requirements required for the CRF funds?

A. Below is the guidance from the July 28 CRF technical guide.

Advertisement of Availability of Funds: CRF funding availability shall be advertised by Subrecipient in both a newspaper of general circulation and, where available, periodicals serving racially, ethnically and income diverse neighborhoods, at least 10 days before the beginning of the application period. This 10-day period does not prevent assistance to applicants that have already applied and been determined eligible prior to the application period. At a minimum, the advertisement shall contain:

- a. The amount of funds projected to be received from the state for the fiscal year(s).
- b. The beginning and ending date of the application period;
- c. The name of the contact person and other pertinent information where applicants may apply for assistance (phone number, address, email, and hours of operation);

Item # 3 Guidance: With the need to make the CRF funds available as soon as possible, the advertising requirement may also be met through the use of the local government's website and social media accounts that are available to the public. Local governments that were already using SHIP funds for similar uses do not need to wait the 10-day period before taking applications.

Q. Need clarification on the advertising requirement. Is the Guidance dated 7/28/2020 saying that we can advertise on our website and social media instead of publishing a NOFA in our local newspaper?

A. That is correct. Keep copies of the method of outreach used.

Q. Do we have to create a separate file if we assistance a household with other funding (like SHIP) previously and are now providing additional assistance with CRF?

A. You do not need to keep a separate file, but you will need to track the assistance provide under CRF separately from other assistance provided.

Q. Many of our residents live permanently on boats as liveaboards or on houseboats. What about slip fees or dock fees?

A. No, houseboats do not need meet the definition of "eligible housing" in the FHFC agreement.

Q. For mortgage assistance, are we able to assist a household that only has 50% homestead exemption?

A. This a local policy decision. A requirement that the mortgage is on the applicant's primary residence may be enough to meet your concerns.

Q. Please clarify that we can assist a person with moving in expenses even if they are were evicted in another city?

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A. Yes, as stated in the Agreement: Housing re-entry assistance - such as security deposits, utility deposits, and temporary storage of household furnishings.

Q. If an applicant's utilities are provided by a city-owned utility company, are you able to pay for these services with CRF? The other CRF/CARES Act funds do not allow such funding since it would be considered revenue replacement.

A. Utilities can include water, sewer, trash, electricity, gas, internet, phone, cable, or other similar services. A local government cannot use CRF funds to replace lost revenue directly, but a local government can provide assistance to an eligible applicant to pay utility bills to continue essential services.

Q. Can we deposit funds into our SHIP account but track everything with project coding on the General Ledger?

A. Yes, you will need to be able to track and report the use of CRF funds separately.

Q. Should each adult in the household sign the duplication of benefits form or only head of household?

A. The head and co-head.

Q. Do we still need to issue an award letter?

A. You are not required to. This is a local decision. Instead, every case of CRF assistance offered as a grant will be accompanied by the applicant signing the duplication of benefits form, which is a document that acknowledges the receipt of a CRF grant.

Q. If a FHFC property does not receive the FHFC assistance, would the renter then be eligible for our assistance. (not all FHFC properties will receive funding under the FHFC Cares Act program)?

A. Yes, after you ensure that there will be no duplication of benefits. We do encourage you to at least contact the FHFC property to seek the other pot of CRF funds.

Q. Is it sufficient back-up documentation for an applicant to show he has an approved Mortgage Forbearance?

A. You are asking about documentation of a COVID-related hardship. No such documentation is required. Instead, the hardship details in the application and the self-certification of hardship are sufficient documentation.

Q. Can parts of the CRF application (i.e. requirement that assets be listed) be removed from the application?

A. No, the method of calculating income is 24 CFR part 5 which includes information on assets and income from assets.

Q. The webinar mentioned a mold inspection/remediation report. This is not applicable to rental and mortgage assistance, correct? It would only apply if rehab is being done?

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A. Yes.

Q. Do we have to establish a maximum award?

A. This is a local decision, but it is advisable to have a maximum so that applicants understand there is a limit.

Q. Why do we need the income certification form if the self-certification form is the basis for assistance?

A. You need to add all the household income and assets in accordance with 24 CFR part 5 and ensure that the household income does not exceed 120% AMI.

Q. In order to expedite the application, is it allowable for only the SHIP staff to sign the RIC and not the applicant? After all, the applicant provides the data we use for this RIC in the self-certification and also the application, both of which the applicant signs.

A. Yes is it allowable for only the SHIP staff and not the applicant to sign the RIC.

Q. Can the Self-certification be electronically signed?

A. Yes.

Q. With social distancing still in place, our office is closed, and we are still working from at home. With this being said, will FHFC accept electronic signatures on the grant agreement and RIC?

A. Yes.

Q. Will FHFC post the properties that will receive CRF funds?

A. FHFC will post the submitted applications on their website here - <https://www.floridahousing.org/about-florida-housing/florida-housing's-coronavirus-relief-fund>

Q. Is homeowner's insurance eligible if it's past due?

A. Yes, if included in the mortgage payment.

Q. Since we are in Hurricane season is removal of dangerous trees allowed for use of CRF funds?

A. Under an CRF emergency repair program, you can include tree removal.

Q. Presenters discussed the additional funds disbursed to cities and counties. I am thinking that maybe our board of county commissioners might want to approve execution in advance with the initial approval resolution.

A. We encourage having the BOCC approve all distributions in the initial approval of the agreement.

Q. Does self-certification mean that we do not need to ask for paystubs, and we do not need to verify income or use a Third-party verification form?

A. Correct, you can use the self-certification to determine income. As a local policy decision, you can require more documentation if you choose.

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Q. Are HOA fees eligible expenses?

A. Yes.

Q. Can we use the contractors in the pool for emergency?

A. Yes you can use your current pool of contractors for this program.

Q. Once an applicant submits a self-certification form, what is the responsibility of the local government?

A. To calculate annual income and assets, add this to an income certification form (RIC), and ensure that the household is income eligible and eligible for CRF.

Q. Can a family who received SHIP rental assistance through our SHIP technical revision for up to 3 months now receive assistance through CRF for an additional 7 months if needed?

A. Yes, if it is documented that they have a continued hardship and there is no duplication of benefits for any given month.

Q. Does the Agreement need to get Commission approval?

A. This is a local decision.

Q. When paying rent assistance in advance as indicated that we could in Training #1, what if the client's lease agreement expires during the period of months that we want to assist them with? Do we have to cut one check for the months covered on existing lease and then wait for new lease agreement to cut check for remaining months?

A. We would not recommend paying rent that is beyond an executed lease period. This may be allowed only if you have confirmation with the applicant's landlord that a tenancy exists for the months assisted.

Q. Our Finance Dept. has set up a fund specifically for the CARES Act. Can we put the revenue and expenses in that fund if we tie them to their own specific project number?

A. Yes, as long as you have a system to track expenditures.

Q. Can these CRF client files be kept electronically vs. a paper file?

A. Under the FHFC Subrecipient Agreement, records must be retained in electronic form. You can also keep files in paper form as a local decision.

Q. Can I send our signed Subrecipient Agreement via email, or do I need to send in the original?

A. You will send the agreement via e-mail.

Q. There is a difference between the guidelines using DEM funds and the CRF Funds. Why are these different when they come from the same pot of money?

A. Check our website for a webinar handout that provides a chart with the difference between DEM and CRF funds. Here is the link: <https://www.flhousing.org/past-ship-trainings/>

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Q. Should I be collecting copies of bank statements for use in my income verification?

A. This is not required for CRF applicants.

Q. DEM does not seem to have an income limit whereas CRF has a limitation of incomes of 120% of median income and under.

A. That is correct.

Q. Can I use Project Delivery Costs to pay the COC working with our program who will be providing some financial counseling?

A. They could be paid, but it's more about the specific activity, not what you are paying. If you are using it for counseling, that is a separate line item like in SHIP, so it is not a project delivery cost.

Q. Our DEM rep says that admin expenses are not to be reimbursed. Why the difference between DEM and CRF?

A. These are different funds and the reimbursement of admin would only be those admin funds associated with the amount of program funds that are being reimbursed, you cannot just pay back all of your admin expenses.

Q. How many months can we pay rental assistance for?

A. Up to 10 months from March 1, 2020 - December 30, 2020.

Q. My community has a rent / utility assistance program that started in June, utilizing previously unencumbered SHIP funds. Since CRF funds are allowed to reimburse those expenses, is it better to reimburse the SHIP funds with the 1st or 2nd payment of CRF funds?

A. You should reimburse those funds with the first payment.

Q. For tracking of funds, they do need to be tracked separately from SHIP, because any interest earned on it has to be returned with unspent funds, right?

A. You need to track these separately.

Q. Even though it will be reported in a similar fashion as SHIP is, for financial reporting purposes, these are federal funds and not State funds for SEFA purposes. Is that right?

A. Correct.

Q. Would the documentation come from the landlord or self-certification from applicant?

A. The documentation of income, assets and hardship will come from the applicant.

Q. Can we have an example of the NOFA?

A. The NOFA requirement described in the subrecipient agreement is similar to the NOFA for SHIP funds.

Q. Are there any best practices on documenting if they are out of work for COVID-related medical reasons while still respecting HIPAA regs?

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A. Using the self-certification form, you will simply ask the applicant to self-certify that they have been impacted by COVID and have a loss in income. They can write any details about the medical nature of the hardship in the application.

Q. What are the allowable methods for signing income/COVID impacts self-certifications, and/or TIC/RIC - Do self-certs need a notary?

A. No they can be witnessed or notarized.

Q. If an applicant is not able to come to City Hall to sign (ex. in quarantine), can they email approval?

A. Yes.

Q. Does each person in the HH fill out the self-cert form, or do we add lines for all HH members to sign one?

A. Each household member over 18 has to sign a self-certification of income form. The resident income certification will reflect all income and asset based on the self-certification forms received.

Q. Can the RIC be mailed and signed and emailed back?

A. Yes

Q. Do we need to have proof of US Citizenship or Legal Residency for all household members?

A. Under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), undocumented immigrants can receive “short-term, non-cash, in-kind emergency disaster relief” regardless of legal status. Because CRF funds are short-term, provide a non-cash housing benefit to applicants (the applicants are not receiving the funds directly), are in-kind (not cash), and for emergency disaster relief, CRF funds can be used to assist persons without consideration of their legal status.

Q. Under household do you need all of those items or is it either or depending on the age?

A. You need information on the income and assets of all household members.

Q. If we are only using CRF funds for rental and mortgage assistance, we still have to request a waiver to the 65%-75% set asides from SHIP?

A. These are not SHIP funds. There are no set aside requirements.

Q. If a client has just started to go into foreclosure can we prevent the foreclosure using CRF funds?

A. Yes.

Q. Does the RIC still need to be notarized?

A. It can be witnessed or notarized.

Q. When CRF dollars reimburse SHIP, what is the process for expending and reporting this SHIP funding?

A. This is tracked as program income received in the 20/21 state fiscal year, so these funds must be encumbered by 2022 and expended by June 30, 2023. Consider this 17/18 example related to reporting:

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If you use CRF to reimburse 17/18 SHIP funds, you will include them on the closeout 17/18 report as expended for rent or mortgage assistance. This records the first time when these SHIP funds were expended. They will next be reimbursed and must be expended again. This second time they are expended will be reported in the 20/21 report. In this way, the CRF reimbursement of SHIP is like any program income that comes from repayment of assistance.

Q. Can we pay for the months covered during the forbearance period so that they do not have to repay it when forbearance period ends?

A. Yes.

Q. I have seen one document say both that the 10% set aside for admin was purely for admin or for admin and project delivery costs. Which is it?

A. You can use 10% of your expenditures for admin and use up to 5% for project delivery.

Q. Is an inspection required for rental assistance for an older mobile home prior to providing assistance?

A. As a best practice, confirm that an older mobile home is not substandard. You may want to perform an inspection, review an aerial photograph on the public records, or have the landlord or tenant certify that the property is standard and habitable.

Q. Do the CRF funds allow for condo fees to be paid that include utilities? Does it have to have the utility component? Condo associations can foreclose on units for non-payment of fees. Please let us know if this would be an allowable cost.

A. Yes this is an eligible cost.