CDBG/CDBG-CV Rental Relief Program
Frequently Asked Questions (FAQs)

1. Can you please be specific on the start date for CDBG/CDBG-CV Rental Relief Program?

Grantees carrying out rental relief subsistence payment activities can provide rental relief assistance to households for rent incurred on or after April 1, 2022.

2. Who is eligible for the program?

The program is generally targeted to low-income renters. To comply with U.S. Department of Housing and Urban Development National Objective requirements, at least 51% of households assisted must have incomes at or below 80% Area Median Income (AMI).

3. How long can assistance be provided for?

Grantees implementing a rental relief program funded with CDBG-CV or with FY2019 or FY2020 CDBG funds used to prevent, prepare for, and respond to coronavirus may provide assistance for a period of up to six consecutive months. Other rental relief programs using formula CDBG allocations may only provide subsistence payments for a period of up to three consecutive months.

Assistance does not need to occur each month. For example, if a household applies to a CDBG-CV program and requires assistance for the first month, but then can cover the second and third month, the household can still receive CDBG-CV assistance for the fourth, fifth, and six months.

Also, this demonstrates that the assistance is based on need and covers necessary and reasonable costs. If a grantee chooses to implement subsistence payments using this method, the program guidelines should outline clear parameters.

4. If a beneficiary already received CDBG-CV subsistence payments, are they also eligible for CDBG-CV rental relief assistance?

A beneficiary can only receive a total of six consecutive months of all subsistence payment assistance through the CDBG-CV program. If a beneficiary previously received CDBG-CV subsistence payments for another need (such as utility payments) and the six-month consecutive period has already expired, that beneficiary would not be eligible for rental relief assistance. However, if the beneficiary received utility assistance in March 2022 and applied for rental relief assistance in April 2022, assuming they meet all eligibility requirements, the

beneficiary could receive 5 months of rental relief assistance (until the six-month consecutive period ends in August 2022).

5.   Do tenants need to be behind on rent at the time of application?

To receive assistance, a tenant does not have to be behind on rent. They have to demonstrate that they don't have the ability to pay rent. Households should ideally be assisted at the time they anticipate being late on their rent, not after they are already late on their payment and have already incurred late fees.

6.   Who must complete the application, the landlord or tenant?

Applications must be completed by the tenant to verify eligibility. Once an applicant is deemed eligible, the grantee will reach out to the landlord to confirm payment processes.

7.   What is a COVID-19 tieback?

Under statute of the CDBG-CV program, all activities must be used to prevent, prepare for, or respond to COVID-19. Grantees are able to establish their threshold and definition of how the activity will meet the COVID-19 tieback. Grantees should maintain this documentation in their program and applicant file. This requirement is only applicable to CDBG-CV funds and FY2019 and FY2020 CDBG funds used to prevent, prepare for, or respond to coronavirus.

8.   What is duplication of benefits?

Duplication of benefits occurs when a person, household, business, government, or other entity receives financial assistance from multiple sources for the same purpose within the same time period, and the total assistance received for that purpose is more than the total need for assistance. As part of the application process, grantees are required to evaluate each application to ensure that a duplication of benefits has not or will not occur. If a beneficiary received ERAP assistance, it would not constitute as a duplication of benefits since the assistance was for a different period of time. This requirement is only applicable to CDBG-CV funds and FY2019 and FY2020 CDBG funds used to prevent, prepare for, or respond to coronavirus.

9.   Is there a habitability standard for units?

Neither HUD nor HCD have established a minimum habitability standard for units assisted through the rental relief program. Grantees may elect, if they so choose, to include habitability standards as part of the program requirements.

10. When does the requirement for a lead-based paint visual inspection come in?

The 100-day emergency grace period begins at the time of the first payment going forward. Once the assistance period reaches 100 days, a visual lead-based paint inspection is required. If assistance is being provided to an individual or family that covers three months of arrears within the first month of assistance, the 100 days begins at the time of payment going forward. As an emergency payments assistance period approaches the end of the 100-day grace period, the grantee must undertake visual inspection if it wishes to continue the CDBG-CV assistance. This only applies to CDBG-CV funds and FY2019 or FY2020 CDBG funds used to prevent, prepare for, or respond to coronavirus because CDBG is limited to three months of assistance and therefore does not exceed the 100-day grace period.

11. Is it acceptable to do a remote visual lead-based paint inspection?

For assistance to continue past 100 days, a visual inspection is required. Because of the coronavirus it may not be possible for an onsite visual inspection to occur. If the situation does not allow for an onsite visual inspection, the owner(s) or a surrogate may perform a remote visual inspection. Grantees are encouraged to develop policies and procedures that allow this method and the necessary documentation required for it.

12. How will payments be made to the landlord?

Following review of the application, the grantee will engage with the landlord to confirm payment processes and issue payments directly to the landlord on behalf of the tenant.