

**COVID Emergency Rental Assistance
Frequently Asked Questions
July 23, 2021**

*FAQs will be expanded upon or amended as the work continues.
Updates are highlighted throughout the document.*

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APPLICATION QUESTIONS

Can agencies work directly with the landlord, rather than tenant?

Yes, the funding bill allows for the landlord to apply on behalf of the tenant so long as the tenant co-signs the application and the landlord is sharing information with the tenant and appropriately applying the payment to the tenant account. Tenant information will need to be collected for reporting to Treasury. The landlord and tenant will need to work together so the landlord can gather the tenant information and required documents.

Can the landlord receive payment if the tenant refuses to participate in the application process?

No.

The landlord has submitted a landlord application, but we have not been contacted by the tenant. Do we have to contact the tenant?

If the application is complete and the landlord has submitted all of the required tenant documents the tenant does not need to be contacted until the eligibility determination is made.

Are there privacy concerns about what kind of information can/should be shared with LLs about a HH?

It will be up to the tenant to determine if they wish to have the landlord apply on their behalf or if the tenant would like to complete their own application and submit their own documentation.

Is there an addendum that can be used to reenroll applicants from EDP to CERA?

No. All CERA applicants will need to have a CERA application completed by either themselves or the landlord. Agencies should contact tenants not funded by EDP so eligibility can be determined for CERA.

If a tenant utilized EDP, and rent and arrears were paid, can the tenant now apply for CERA funds, and would a new application be needed?

Yes, the tenant can apply for CERA. A new application is needed to obtain updated information. The service agency must review the EDP records to ensure duplicate payment is not made.

Can we use our own electronic application form instead of a PDF until the State's version is available? I.e. do away with the paper form altogether?

Agencies may use their own electronic application until the CERA application becomes available if the application matches the CERA paper application. Agencies must make paper applications available for tenants and landlords that cannot or do not wish to complete an online application. All paper applications or electronic applications collected before the MSHDA CERA online application is available must be entered into the MSHDA online application within five days of receiving a complete application.

Do we HAVE to have clients and landlords complete the online application or can we manually enter paper apps? Or is there an option to print the application to have a paper file on hand?

When possible, it is preferred that tenants and LLs complete the online application which will result in a faster and easier process. However, agencies must accept paper applications as tenants and landlords cannot be required to use the online application. Agencies will need to manually enter paper applications into system. Agencies cannot choose to only accept paper applications. All CERA records must be maintained in the CERA software system.

Regarding clients that are moving out of their unit and into a new unit where they would be applying their future rent, the new landlord is supposed to fill out an owner/landlord application. How does this work? Do they apply in the portal or on paper? And if in the portal, how do they do so to connect themselves with the client and their CERA application?

The new landlord will need to submit a paper application.

We have a situation where a tenant completed the application on the portal but did not sign in the space but only typed their names. Is it okay to continue to process this case or should we ask the client to sign a paper application and attach it to their case in the portal?

The agency should ask the tenant to send an email verifying that they agree to the certification statements on the application. The email should be uploaded to the file to serve as the signature for the application.

We have the landlord portion of a paper application but cannot process the application because the tenant never submitted an application or returned our contact. Does the landlord application need to be entered into the portal and rejected/denied?

No, if you only have a landlord application because the tenant never applied, you do not need to enter the landlord application into the portal because it is not considered an actual application unless the tenant application is included. Agencies should retain the landlord applications for a while in case tenant eventually applies.

Can the head of household/applicant be changed on the CERA tenant application if that person is no longer in the unit and there are remaining family members in the unit?

Yes. Agencies may either have the remaining household member reapply with a new application (and deny the previous application as a duplicate application) or change the head of household on the original application and record in the audit/activity log notes explaining the situation and that the remaining applicants are eligible to apply for CERA. ID for the new head of household and any other missing info for new head of household must be obtained.

ELIGIBILITY QUESTIONS

Can these funds only pay rent arrears owed from 3/13/2020 forward?

Yes. Any tenant partial payments get applied to the furthest debt so the majority of applicant arrears should be from after March 13, 2020.

If a tenant received EDP funds, will they be eligible for CERA?

Yes. Agencies will need to review the EDP assistance that was provided to make sure CERA payments are not paid for any months covered by EDP. CERA can assist with the tenant portion of EDP if the tenant still owes that money to the landlord and the arrearages are from on or after March 13, 2020. If under EDP, the tenant portion was for arrearages prior to March 13, 2020, that part of the tenant portion cannot be paid with CERA. For both EDP and CERA, program funds cannot be used for arrearages that were before the COVID pandemic. The EDP funds cannot be applied like regular payments to the oldest debt, so tenant portions for arrearages before March 13, 2020 cannot be paid.

MSHDA's guidance has made it clear that the HARA needs to do its due diligence to ensure a client has not received EDP payments covering the same period of time a CERA payment would. Are we requiring our processors to check in HMIS for this information?

Agencies must check HMIS to determine if the tenant was assisted by EDP. MSHDA does not require which staff member does this check, but it is suggested that this check is done early in the process of reviewing the application rather than at the end of the process.

HMIS is the only spot in which we could see an EDP payout across the state, but not everybody on our CERA team has HMIS access. Any guidance on best practices here?

Agencies may wish to consider a process where a couple staff with HMIS licenses are reviewing the cases that have been assigned to reviewers and sending reviewers the EDP status of a client. Another option is to have a Google sheet where the Reviewers add the head of household name to the list when they are assigned the case and HMIS staff also have access to the list, and they fill in EDP Yes/No and the months and amount of assistance provided.

Does there have to be an eviction notice?

No. Any official or unofficial written notice from the landlord stating the rent is late will be acceptable.

Do households have to have a shut-off notice for utility assistance?

No. Tenants may be eligible for future utility assistance if they do not have utility arrears but still meet the eligibility requirements which includes having rental arrears if there are not any utility arrears.

Must a beneficiary of CERA have rental arrears?

No. Tenants may be eligible for assistance if they do not have rental arrears but still meet the eligibility requirements which includes having utility arrears if there are not any rental arrears. This means that a tenant may receive rental assistance, utility assistance and/or internet assistance if they are otherwise eligible even if they have only utility arrears or only rental arrears.

Will SER application be required as part of the utility and/or rental assistance?

SER is not required as part of the CERA application process. If a tenant reaches the assistance cap and still has utility or rental arrears they should be referred to SER.

Can the program assist tenants who already have a judgement against them but are still living in the unit?

Yes, program funds may be used to assist tenants after the judgement if the tenant is still living in the unit. The settlement statement should be used for tenants in this situation.

The tenant has moved out but left belongings in the unit. Can the tenant be assisted?

No. The tenant must be living in the unit, not just have belongings in the unit, at the time of CERA payment.

We just received a call from a landlord that the tenant we have been working on finalizing payment for passed away. If we have a fully complete file from the tenant would the program still allow the past due rent and utilities be paid if the tenant just passed away?

CERA cannot assist if the tenant is not living in the unit at the time the payment is issued.

If client has a past due utility bill preventing them from obtaining housing ... can CERA assist?

No. The federal bill does not allow homeless people to be served. Eligibility requires that the applicant be a current renter household that has an obligation of rent to be paid.

If clients are currently homeless can CERA assist with rental arrears?

No. Homeless households cannot be assisted with rental arrears from previous units.

Are educational institutions like colleges and universities that rent out property, including dorm space or grad housing to students, an allowable "landlord" to receive funds for "student-tenants"?

If the student is the leaseholder then the eligibility would be based on the student's income. If the parents sign the lease then the parents' income would be used to determine eligibility. Eligibility for students living in dorms has not been determined at this time.

Can CERA provide assistance to homeowners to cover their mortgage payment, utilities or energy costs?

No.

So we can't help with mortgages, can we potentially assist with utilities on rent-to-own leases?

In most situations no because most rent to owns are land contracts. CERA can assist with co ops because it is basically a rental situation.

What about property taxes?

CERA funds are only for renters and therefore cannot be used to pay property taxes.

Can CERA pay rental arrears based on only the landlord application if the tenant refuses to participate/provide information?

No.

Will this funding be able to help relocate people who originally had 30-day notices where a rent payment will not stop the eviction?

No.

If a tenant is ineligible due income but you can see most of their income is garnished by child support, can an exception be made?

Eligibility is based on income from the past 30 days or the 2020 taxes. CERA does not make adjustments for expenses such as child support, but you could look at the 2020 taxes and see if that makes a difference and if so, use that income verification to process the case.

If a tenant is unresponsive to requests for required documents after repeated attempts after 30 days, do we leave that application in the Need More Info-Seeking status indefinitely or do we deny the application after a certain period of time?

Deny applications as unresponsive with no response from tenant after 30 days. If the tenant requests assistance again in the future, they will need to reapply.

INCOME QUESTIONS

Should plasma donations be considered income?

Yes. Plasma donations are considered income.

If a child's income is paid in the parent's name, for example SSI, does that count as income?

No.

If a child receives SSI income as a survivor benefit for a parent that passed away should this income be counted?

Yes, a survivor benefit paid to replace parental income should be included as household income.

Are foster care payments included in income?

No.

Do we include student loan refunds in annual income calculations?

No. Loan money is not income.

Will the child tax credit that begins 7-15-21 be counted as income for CERA?

No.

How are unemployment benefits going to be calculated in conjunction with household income in light of the American Rescue Plan's \$10,200 waiver?

There will be no changes to calculation of income due to the waiver.

We have someone who is a negative renter and gets a \$29 check from their PHA currently. Would this be considered income? A negative renter would be someone in a subsidized unit. Where once they factor their income and deductions together their 30% (income/ratio for rent) once they counter the utility allowance towards their rent portion, they become a negative. Example, rent portion is \$50 but their utility allowance is \$150 so they end up getting a check back of \$100. The PHA essentially pays them a portion to live in the unit.

No, this payment would not be considered income for CERA.

If a tenant received a lump sum payment for SSDI for retro pay, will that need to be counted towards that annual income?

This income should be counted based on the monthly amount that will be received, not based on the amount of the lump sum.

LEASE QUESTIONS

When a client is on a month-to-month lease, can the month-to-month premium be included in rent?

Yes.

A household member left the unit months ago but is still on the lease. Can the family be assisted?

Yes. The application should be completed based on the current residents living in the unit and in need of assistance. It should be noted in case notes that the specific household member on the lease no longer resides in the unit.

For a person to be considered as a member of a household, does that person need to be on the lease?

No because the lease is not always up to date. Agencies should use the application to determine who is living in the household.

If the lease indicates that outstanding balances will be considered unpaid rent, will CERA funds cover that expense as a rental arrearage?

No, not necessarily. The original expense type must be examined and can be paid if it is otherwise eligible.

VERIFICATION QUESTIONS

Is identification required for all adults and children in the applicant household?

No. The only ID required is for the adult completing the application for assistance.

We have someone who receives social security, but they lost the benefit award letter that has the amount needed for verification. They took a screenshot of their bank statement and it has a monthly deposit that is titled "social security." Is the bank statement adequate verification of income?

Yes, verification of automatic deposits on a bank statement are acceptable verification of income if the tenant is not able to obtain a new award letter from Social Security in a timely manner.

For Social Security income, if a tenant does not have bank statements and cannot provide a screenshot of the bank statements, is the Social Security benefit letter from January acceptable verification? Social Security only mails out benefit letters once each year in January.

Yes.

What is an acceptable document to verify unemployment? The complaints from the clients have been they just have a prepaid card where the payments are going and they don't have access to or receive statements from that card. Another has been they don't know where to obtain documentation inside the unemployment system.

If the tenant has not received or does not have written verification of unemployment income, if they have access to the internet they can log in to their account and send a screenshot or picture showing the unemployment payments that are loaded onto the debit card for the past 30 days. If the tenant does not have access to the internet, they may contact unemployment and request written verification of the benefit amount.

Are we still able to use 2020 tax documents as proof of income if the income has changed since 2020 (started/stopped unemployment, for instance)?

Yes, as of now, 2020 tax documents are acceptable even if the income has changed.

Would a year end pay stub be acceptable for income documentation - as an alternative to the 1040?

No.

Do the income statements have to be the last 30 days? Or can we accept a recent month's worth of pay stubs?

Pay stubs do not have to be the most recent paystubs but should be from the last month or two.

What verification is required for landlord court costs?

Landlord court costs must be verified using a court document. A ledger or an attorney's bill are not adequate verification of landlord court costs. If the landlord cannot provide any verification of the court costs the program worksheet should be completed for the rental assistance amounts. The court costs can be added to the worksheet upon receipt of the conditional dismissal. Court fee assistance is not an automatic \$150. \$150 is the cap. The rental assistance and the court costs can be put into one payment.

Will the "reviewers" or "managers" just be taking the landlord's ledger as though it is accurate?

Agencies need to look at the case in its entirety and compare the information provided by the landlord and the tenant. Inconsistencies need to be resolved before the assistance determination can be made.

We have a landlord who is not participating in CERA. The tenant reports he is \$2400 past due, the landlord reported to our intake worker he is behind \$2400 but we are now unable to make contact with the landlord to get that statement in writing. We have a copy of the lease that notes his monthly rent of \$800. Is a case note acceptable in cases where the landlord does not participate, and we are unable to make contact or they are not willing to provide documentation?

Yes, in this situation a case note is fine since the LL and tenant reported arrearage amounts match.

For COVID hardship verification, do medical bills that are not COVID related qualify if the tenant is receiving SS income and their income has not changed? And if so, do they need to submit medical bills as proof of hardship?

To document hardship, CERA only requires a letter from the household stating the timeframe under which medical expenses were incurred. The tenant does not need to provide bills or detailed medical information and this information should not be requested. HIPPA protected information should not be collected from tenants or retained if the tenant provides it to the agency.

As the reviewers are reviewing the online portal applications, it seems like the applicants are not submitting a document for a risk of homelessness or housing instability. Is that a separate document that the landlord or tenant needs to upload? Or is this something that is no longer required or is addressed in a question field in the portal?

Applications in the portal only need the questions answered and the comment box completed for the COVID Hardship verification. By uploading their utility bills and stating their rental arrearages, that is showing the risk of homelessness or housing instability.

RENTAL ASSISTANCE QUESTIONS

If a person is living in a camper that is pulled up onto a mobile home lot and renting or renting a piece of property to park the camper/RV can we assist with lot/property rent?

Yes, this situation would be handled like a mobile home lot rent case.

There is a lease reflective of \$900 for rent and signed in 2019. The rent was raised as a verbal and now is \$950 which was noted on the application and in the documentation. There is nothing newer reflective that the rent amount changed. Can we use the lease from 2019? The landlord does not want to do a new one.

If the tenant agrees that the rent was raised to \$950, then \$950 can be used as the monthly rent. A clear reporting of the unpaid rent is required and if the landlord is using the application to do this, the tenant should also be asked if this matches their records in terms of how much they owe.

Per the LL paper application, the Landlord states that the rent will be increased on June 1st. We already made one payment at the old rate? The worksheet shows 3 months of rent at the old rate. How do I handle this? Is the LL allowed to raise the rent during our assistance or does he have to wait until our assistance is done?

Future rent payments will not be adjusted for rent increases unless the rent increase is noted at the time of application/before the future rent payment is issued.

We have a tenant who is eligible for 3 months forward in rent. She will be moving out of her unit in June and will only need 1 month forward. We cannot change the amount on the excel calculation worksheet.

What do we do in this case- as well if the tenant refuses the 3 months forward, it auto populates and we cannot take the amounts off. Do we just print and cross off and add new amounts and upload?

A second worksheet should be used for the 1 month forward rent in the new unit.

If the tenant refuses forward rent, or in the situation with the tenant moving and only getting one month's rent in the new unit, cross off the amounts not being paid and write in the correct amount and make a note on the worksheet why only one month is being paid.

The tenant lives in a subsidized unit and the tenant portion of rent will be changing. How do we handle the future rent payment if we do not know the new tenant portion of rent?

The agency should wait to approve the case in system until the tenant portion of rent has been determined.

We are receiving tenant applications where the landlord no longer wants to rent to the tenant (filing in court) and the tenant has nowhere else to go. What is the timeframe that we are to use if a landlord is not identified right away? (for future rent payments)

For these situations the tenant should be paid the arrearage since the landlord will not participate in the program. You can then close the case out and when the tenant finds a new unit the tenant can recertify and apply for additional assistance. This process may change as additional functions become available in the portal.

Regarding clients that are moving out of their unit and into a new unit where they would be applying their future rent, the new landlord is supposed to fill out an owner/landlord application. How does that work? Do they apply in the portal or on paper? And if in the portal, how do they do so to connect themselves with the client and their CERA application?

The new landlord should complete a paper application. The agency will then upload the application as supporting documentation and note in the portal that there is a new landlord for the future rent payments. The agency will need to manually keep track of the two landlord payments because fiscal will only show payments going to one landlord. When exporting the Excel spreadsheet showing the payment report, the agency will need to go to that line and overwrite the cells with the new LL information.

We have a tenant that we assisted with May and June's rent but did not provide future rent because the tenant told us they were moving at the end of their lease (June). Now they re-signed a three-month extension and want the future assistance. Do we treat it as a 'new unit' move and pay the three months future plus having that recertification option, or do we have to process this as a recertification and that would be the max of their assistance?

Treat this situation as a recertification.

If we have a tenant who had their last month paid (rental arrears) at one residence, then moved because their lease was up and they wanted to move my understanding is we can pay the future rent to their new place, so long as it fits criteria. My question is what if that tenant who is moving decides to move outside of the county?

CERA can assist with future rent assistance if the tenant moves to another county in Michigan. The case can stay with the same agency, the future rent payment does not need to be processed by an agency in the other county.

CERA cannot pay future rent if the tenant moves out of Michigan because the CERA funds received are specifically for Michigan.

The tenant has a dog that they pay an additional \$35/month for. Is that something that can be paid for with these funds?

The Program cannot cover the cost of pet fees. If possible, please work with the landlord to see if the landlord is willing to waive the pet fees. If the landlord will not waive the pet fees, then the pet fees must be put into a tenant repayment plan in the Settlement Statement if the landlord is willing to accept a payment plan.

Can additional fees such as car port fees or washer and dryer rental from the landlord be paid?

Carports or washer/dryer fees are okay to be included in the rent if they are clearly outlined in the lease.

Can an insurance waiver fee be included as part of the rent in the CERA payment? The landlord requires the tenants to obtain renter's insurance, and if they do not, they are charged a mandatory fee of \$10/month called an insurance waiver fee. What about other mandatory fees?

An insurance waiver fee can be included in the rent for CERA assistance. MSHDA does not have a full list of possible additional fees in leases but if you have other common fees that you would like to bring to our attention we can include whether or not they can be covered by CERA in future updates.

Are NFS (insufficient funds)/bounced check fees charged to the tenant considered late fees and able to be included in the late fee amount for CERA assistance?

No.

Can "risk fees" for tenants with bad credit/rental histories charged an additional monthly fee be paid?

Risk fees may be included in CERA assistance if they are included in the lease.

Can CERA pay for bed bug/extermination charges?

No.

We are working on a tenant ledger and they moved in November of 2020. It appears that they did not pay the security deposit or the cleaning fees. Is that a tenant responsibility or is that something the program can cover?

These are tenant responsibility expenses.

Is a process server fee an allowable court fee to reimburse the landlord?

Yes, that is a court cost.

Checking on attorney fees. I know CERA doesn't pay them, but just confirming the landlord needs to waive them. Is that correct? We've gotten some pushback from some landlords about counting attorney fees and court costs interchangeably and we are explaining that they are not the same thing and attorney fees are not covered under CERA.

CERA does not address attorney fees. Ideally the landlord will waive these fees but it is not a program requirement.

How long do you expect a case to be processed, from the time of application through final payment? If the process will be longer than one month, how will arrears be accounted for--based on the time of application or the time of payment?

Arrears may be accounted for based on the time of payment unless the maximum amount of assistance has already been reached.

UTILITY ASSISTANCE QUESTIONS

Will CERA pay more than one utility per household?

Yes. CERA can pay any combination of allowable utilities within the cap amount stated in program guidance.

If utilities are part of lease, paid to LL, are those included?

If the utilities are the same amount or variable amounts each month for the tenant, payable to the landlord, they should be included on the utility worksheet with the provider listed as "Landlord".

If the landlord is charging a trash fee to the tenant, is it covered, or do we have to prove that the landlord is receiving the trash bill as part of another utility bill?

If the tenant pays the LL for trash and this is stated in the lease, separate from the contract rent amount, CERA can assist with trash payments to the LL.

We have a lot of residents coming in with their utilities being in their landlord's name due to non-payments. Can we pay the utility if it is in the LL name?

Yes, if the lease states the tenant is responsible for the utility payments and the ledger shows a history of the tenant paying the landlord for the utilities. In these situations, the payment will be paid to the landlord.

Per the lease, "all utilities must be in the tenant's name." Unfortunately, the tenant did not have them in her name immediately. The transfer was recent, but the landlord had to pay utilities since the beginning of the lease which is dated January 1, 2021. The landlord filed the eviction matter and did claim not only past due rent but also the utilities. If the landlord shows proof of payment, is that statement in the lease sufficient to pay the landlord for the utilities that were the tenant's responsibility?

Yes.

If the utility bill is in another person's name besides the head of household, can CERA provide utility assistance?

If the utility bill is in the name of another person living in the household, assistance may be provided. If the utility bill is in the name of a person not living in the household, the agency will need to find out from the tenant why the utility is in the name of another person. If there is a valid reason such as the tenant was unable to put the utility in their name due to poor payment history, assistance may be provided.

How do we pay for propane deliveries? Do we schedule a delivery and then bill us?

Contact the company and explain the program to them and discuss how to work together. CERA will need a bill to be able to assist with propane.

I have a client who has to pay to have their sewer pumped. It is part of their lease that they are responsible for this as part of the management of the property. Would this count as a sewer bill?

Yes.

If the utilities are disconnected and have been for some time, can the funding be used to restore utilities?

Yes.

I have a client with a Consumer's bill but there is a security deposit and a reconnect fee added onto the bill. Are those fees that can be paid by CERA? Or should we just be paying for the gas and electric portions of their bill?

CERA can assist with the security deposit and the reconnect fee. Total utility assistance cannot exceed the program limits.

Can CERA pay for a frozen water meter charge? It is on the water bill. The water froze and cracked the meter and the City needed to replace it. The City charges \$150 for a new meter/installation.

Yes.

I am seeking clarification about assisting tenants with utility payments when they are actively enrolled or recently de-enrolled in CARE, LSP other vendor discount payment plans (SPP and WPP). It is my understanding when a customer is enrolled, there is arrearages on the account and these enrollments provide a discounted rate moving forward and/ or while addressing past arrearages. Also, for CARE and LSP, the enrolling MEAP grantee is also providing arrearage assistance with MEAP funds. If we look up an account today, the balance could be not an actual amount owed. In speaking with CE and DTE, the guidance was they can accept CERA payments on accounts. I am not sure how this works if MEAP funds are also being used. I am aware the arrearage before March 13, 2020 has to be determined.

Tenants in utility payment plan programs are eligible for CERA. Agencies should attempt to determine the amount of the arrearage by contacting the utility company if necessary. If another program is assisting the tenant, the agency will need to confirm that the time period requested for CERA assistance does not overlap with the assistance provided by the other program.

Will CERA assist tenants with investigation flags on Consumers Energy or other utility accounts? It usually means that the provider is investigating the individual for fraudulent use of energy such as tapping into another user's line etc.

If possible, verification should be obtained from the utility provider of whether the flag indicates there is an investigation for fraud. If the account is being investigated for fraud, CERA cannot assist unless the fraud investigation is cleared with no wrongdoing on the part of the tenant. If the provider is not able to release the reason for the flag to the agency, the tenant will need to obtain verification from the utility provider that the account is in good standing aside from the past due balance.

Is it MSHDA's intent to make the CERA program a supplemental utility program by having agencies reach out to households behind on utilities?

MSHDA has been coordinating with utility companies and they will let clients know CERA is available. HARAs do not need to do outreach to tenants who are only behind on utilities. DHHS has a pop up in MI Bridges on the website telling people about the CERA program.

Is there a calculation worksheet to notate what utility assistance is not eligible prior to March 13, 2020? For example, client submits a bill that covers February 28 to March 27th 2020, part of that month is not covered by CERA, how do we ensure the calculation is uniform?

Bills that include time prior to March 13, 2020 should be prorated so CERA only assists with arrearages from on or after March 13, 2020. Utility arrearages from prior to March 13, 2020 should not be included in the calculation worksheet.

INTERNET ASSISTANCE QUESTIONS

Will you please clarify the Internet Stipend? Some of the tenants only pay \$10/month for internet. In a case like that, should we pay \$50, or \$100 (to keep within the standard \$50)? Or is there another way you'd like us to do it?

All tenants receive the same amount for the internet stipend regardless of the amount of the internet bill.

Can we pay the internet assistance to the internet provider instead of the tenant?

Yes, if the provider is willing to take agency payment and credit the account for future payments.

If the landlord clearly states in the ledger that the tenant is paying internet through them, we have been sending the \$300.00 stipend to the landlord to put toward internet.

If the internet is labeled amenity- we have not been sending internet payment unless the landlord can prove that the amenity is internet with a bill.

Would that be the correct way to proceed?

Yes, that is the correct way to proceed.

We have some households that use their cell phone/data plan as a hot spot for internet for other devices. Is that going to be something that can be approved for the internet assistance?

No. Internet assistance can only be paid for the internet. CERA cannot pay for cell phone service.

One of our clients as her internet bill in collections. She does not have an active internet account. Can she still receive the \$300.00 for internet assistance?

No.

Can the HARA opt out of the internet assistance?

No. CERA assistance must be consistent across the state.

How should we record if internet assistance is provided for a tenant? It is not included on the assistance worksheet, so we want to make sure we are recording that assistance appropriately as a part of the tenant's file.

The internet stipend is not on the worksheet because there is no calculation involved. The amount paid is the same amount for each eligible tenant. Each agency will need to determine how to note internet assistance in the tenant file. Once the online application is available, internet assistance will be part of the workflow and the internet assistance will be captured.

ASSISTANCE PAYMENT QUESTIONS

Is the future rent assistance something the tenants needs to accept? If they have regained income, can they accept the past due repayment and deny the future rent assistance?

The tenant is not required to accept the future rent assistance; however, this decision must be made by the tenant, not the agency providing CERA assistance.

The tenant paid the next month's (future) rent which would be one of the three months for future rental payments. Can CERA still pay 3 months forward?

Yes, the tenant will still qualify for the future rent.

The landlord sold the property. The tenant qualifies for 2 months future rent that would be paid to the new landlord. Do we fill out 2 Settlement Statements and note the sale of the house and the new lease?

Yes.

The tenant received a summons. Before the hearing, the landlord sold the unit. The tenant is still behind in rent with the new landlord. Can we pay the past landlord?

Yes, will take some investigation but payments can be made to both landlords. The agency will need to pay careful attention to the details of the case and discuss the case with Legal Services.

The owner has a management agreement in place for the property. Who should the check be issued to?

The check for rent assistance may be issued to the management company if there is a management agreement in place. The Settlement Statement should reflect the landlord's name and the management company name. Ideally this case should be reviewed by Legal Services prior to a determination being made.

If a Conditional Dismissal Order is used, when can the payment be made to the landlord?

The rent payment can be made after the conditional dismissal order is filed with the court.

Do Conditional Dismissal Orders need to be signed by the landlord/attorney and the tenant/attorney in addition to the Judge? Or is the judge's signature only sufficient?

The CERA payment can be made after the Conditional Dismissal Order is filed with the court. No signatures are required on the Conditional Dismissal Order for the CERA payment to be made.

Will the Department of Treasury consider this as income for tax purposes at the end of the year for the individual?

No, CERA assistance is not considered income for the tenant. For a landlord, it is considered rental income.

A landlord filed a non-payment case but does not want money. There are a few repairs needed (not serious habitability issues) and the tenant would like to stay in the home. The landlord appears to want to treat the case as a termination of tenancy matter and not have to give the notice and time that type of case would require. He has also indicated that he plans to pursue the rent after the

tenant moves. Can we use CERA funds to pay the tenant's rent to the court? Once paid the funds would be out of our control and they would go to the landlord.

Yes, this is possible. Legal Services should be involved in this type of case.

What happens if a judgment, not Consent Order, has been entered? Can the judgment be paid or does it need to be amended to a Consent Order?

Yes, judgments can be paid if the tenant is still living in the unit and the case is still within the judgment payment period. Legal Services should be involved in this type of case.

What will happen in the case where the tenant receives funds directly and does not use the Rental Assistance as directed?

It may be presumed that the tenant will be evicted. The tenant will not be eligible for additional CERA assistance.

Will/can there be a requirement that landlord must "zero" out the tenant's ledger to reflect the Settlement Statement (and waiver of certain monies) once payment is received? We see landlords hold tenants responsible for waived charges and most tenants are unaware or simply pay to stay. CERA agencies would have a difficult time enforcing specific ledger transactions on the landlord, but if the landlord tried to evict the tenant or collect on payments that were agreed upon to be waived the tenant should contact Legal Services for their assistance.

If the landlord does not initial all or part of section 5 on the landlord application, can the funds still be administered?

If the landlord does not agree/does not initial that part of the application, they will be considered to have opted-out of the program and the funding will be provided to the tenant after the eligibility has been determined. The tenant will use those funds to pay the rent due.

Do we HAVE to pay tenants directly for internet or if the landlord or utility company opt out of CERA? Our agency has a policy to NOT give payment directly to clients.

CERA requires the ability to pay clients directly. Agencies must be able to pay tenants directly as this is federally allowable and an important part of program. If agencies have existing policies in place prohibiting payments to be made directly to the tenant, please work with the board or whatever the agency structure may be to amend the policy to allow CERA payments to be issued directly to tenants.

I have an application that I have processed that received rental arrearages, future rent assistance, utility arrearages and future utility assistance. After the landlord received the check and the balance was paid, the tenant decided to move to another county. I just found out that the landlord sent a check for the future rent assistance to the tenant's new landlord. Please advise on what I should do in this situation.

First try to communicate with the new landlord to see if they will provide the W-9. If they will and can cash the check, it is fine for the new landlord to keep the funds. Agency finance staff will need to be informed of the new W-9 so that the new landlord gets the proper 1099. If the new landlord is not responsive or will not participate, the assistance needs to be collected back from the landlord of the unit where the tenant was living at the time of application. If the new landlord would like to participate in the program, the new landlord must complete the paperwork so there is accurate record of the amounts paid to each landlord.

I started working with a tenant on 3/31/21. I just found out today by DHS that they moved downstate on 4/10/21. The payment for the arrears was mailed out to the LL on 4/13/21. Should I recoup that payment since the tenant is no longer in the house?

Yes.

Regarding overpayments to LL (tenant moves out before end of 3 month future assistance, tenant moved out and agency did not find out until after they mailed the payment, etc.):

How do we handle the overpayment if the landlord is not willing to reimburse the agency?

The agency should send a formal letter to the landlord that if the funds are not repaid within two weeks that the failure to repay will be reported to the State of Michigan and can be collected by the Michigan Department of Treasury.

What do we do with funds that are returned by the landlord or tenant? Either the landlord found they made a mistake in the ledger they provided and now want to return the funds, or the tenant has decided to move out and the future rent we paid is being returned by the landlord. How does MSHDA want us to record the returned funds?

The agency should accept the payment return it to the program funds. Once the fiscal process in the portal can be reopened, the agency will need to go back into the case and enter the updated information.

For those instances where a landlord will not participate in CERA, may a HARA obtain tenant permission to send an assistance payment directly to the landlord?

Yes, if the HARA has the landlord's W-9, a HARA may obtain tenant permission to send a CERA payment to that landlord that might otherwise be required to be sent to the tenant.

MOTEL ASSISTANCE FOR NON-LEASE HOLDERS QUESTIONS

If we do not have any additional motel funds available in our community and need to use CERA motel assistance, could we use self-certification of income initially for motel assistance?

Yes, you can then work to collect the complete list of documentation while the tenant is in the motel.

The guidance states that we should not process through fiscal until a unit has been found. How would we pay the motel? We'd have to wait until a unit was found? What happens to the motel payment if a unit is never found?

Agencies can pay for the motel but should not complete the fiscal process until the case is closed. Agencies should obtain the motel invoices, pay the motel, and upload the invoices in the supporting documents. Motel assistance should be included in the other housing assistance box. Soon a motel assistance box will be added to the portal. If the tenant does not locate a unit, the case would eventually be closed, and the fiscal process would be completed in the portal.

AGENCY SERVICE DELIVERY QUESTIONS

What funding will be provided to Legal Service Providers so they can increase their capacity to match what the HARA's will be doing?

A direct grant of approximately \$7 million will be made to the Michigan State Bar Foundation, similar to EDP. CERA does not require court involvement for eligibility so many of the applicants may be assisted without needing legal services.

Will it still be required to attend court for eviction cases?

It may be beneficial for Legal Services or agency staff to attend court for eviction cases but this is not a requirement.

As to structure, can we split between functions? I.e. HARA as the lead agency which will complete intakes, assign to partner agencies to complete files, then the partner agencies will submit completed files back to the HARA to process checks.

This could be a process. If you have multiple providers ideally there is one agency providing intake. This will be important to avoid duplicating work. Locally it can be determined if it makes the most sense for each agency to make payments or if payments should be made by the HARA.

Will HARAs be able to “prioritize” applicants with pending writs and/or prior judgments?

Yes, HARAs are required to prioritize court cases throughout the life of the CERA program.

It is acceptable to prioritize households applying for rental assistance above households without rent arrearages that apply for utility assistance?

MSHDA will not advise agencies on this type of prioritization. It is appropriate for an agency to look at urgency when reviewing applications. Agencies need to move through applications as quickly as possible.

Is HQS required for CERA?

No, HQS is not required for CERA.

Will MSHDA continue its batch program with landlords?

MSHDA does not have plans to process batch applications at this time.

How do we handle conflict of interest cases when the tenant has a family member working for the CERA partner agency or the tenant works for the CERA partner agency?

Agencies can still work with these households, as long as the source of conflict is not directly handling the case (i.e., another, unrelated worker is review/approving eligibility and assistance).

Would it be wise to have computer portals or tablets in our office to help those with no access, etc.?

This is an agency choice and would be an admin expense. Social distancing and other factors must be taken into consideration. It may be easier or more cost effective to use paper applications in these situations.

How do we monitor and manage applicants that have already been served through past EDP or another HUD-HARA program to avoid clients double dipping so we can truly serve those in need that haven't been assisted yet?

Agencies need to look at EDP records and HMIS records to make sure CERA des not pay for months paid for by EDP. Review of the ledger should include verifying that the EDP payments were properly credited when applicable. Review of the ledger should also verify if rental payments are being received from another program.

Are sub-grantees required for this project?

Some CoC/LPBs are required to have sub-grantees. If sub-grantees are required for a CoC/LPB it was noted in the first notice to the CoC/LPB regarding the estimate of CERA funds that will be available.

What if the application is started before the tenant is served with a complaint, but doesn't get a settlement statement until after a complaint has been filed, how do you know the tenant is now in court?

The case would be processed the same either way, so if the HARA is not informed the case is not in court it should not change the outcome. If the tenant has issues after the payment has been made in that the court case has not been dismissed, Legal Services should be brought in to assist.

Does MSHDA have an appeal or grievance process for applicants who are denied CERA assistance?

No. Agencies must use their own appeals process for applicants that wish to file a grievance or appeal for a CERA denial.

FUNDING QUESTIONS

Is it 65% of financial assistance funds or 65% of total funding that must be obligated by 9-30-21?

65% of the total funding must be spent or obligated by 9-30-21.

Should we plan to spend our allocation by 9/30/21? Including admin case management? If an extension is granted, will additional case management be offered?

65% of the total funding needs to be spent or obligated by 9-30-21. We do not know at this point if additional admin/case management funds will be available if the grant is extended.

For planning purposes, should we budget our case management and admin to be spent out fully by 9/30/2021?

No. At least 65% of the funds must be spent or obligated by 9-30-21 otherwise funds may be swept from MSHDA.

What happens if all the admin money is spent but not all of the rental assistance money gets spent? For example, staff will need to be paid regardless of whether or not there are enough eligible cases to spend the money on in the county.

It is fine if all the admin costs are spent. If there are significant rental assistance funds unspent by mid - summer and it appears that an agency will not spend 65% of the funds by 9-30-21, some of the rental assistance may be diverted to other communities that have higher spending.

With the CRF-EDP grant, if the case management budget was exhausted, case management could be allocated to administrative costs...will that be the same with CERA?

Yes, agencies can shift costs to Admin and when MSHDA does the grant amendment to add in more financial assistance funds we can shift funds from case management to admin if agencies would like us to.

Is the timeline for the allocation just the calendar year?

The timeline for the allocation is for the calendar year but subject to change based on whether or not 65% of the funds are spent or obligated by 9-30-21.

We're trying to budget/forecast Administrative Costs...not knowing if it will end on 12/31/21 or be extended to 03/31/22. Any input offered would be warmly welcomed.

There will not be any additional admin/case management funding provided to agencies for operations in 2021 so please be sure to budget accordingly. There will be additional funds coming from the recently passed American Rescue Plan, but those funds will primarily be used in 2022 and 2023.

If money is recaptured and we have clients currently utilizing funds what will happen to continue the assistance for these clients if they will not qualify for any other programs?

It is our understanding that obligated funds include future rent payments.

Will the opportunity for an advance of funds be available?

Yes. Agencies should start thinking about getting a line of credit if they do not already have one. Interest and fees are eligible admin costs, and the line of credit can help agencies with cash flow issues. Every time an FSR is done agencies should request an advance to maintain cash flow.

Will agencies be able to request operating advances, and if so, what % would it be?

Yes. 25% of the grant will initially be advanced. Each monthly FSR should be a 25% advance.

Will MSHDA consider making payments to grantees via wire?

MSHDA is exploring this possibility. If electronic payments are made to grantees, all grantees must accept electronic payments.

Will there be a program use priority: ESG-CV vs CERA? Or will it just be based on what fits the client the best?

Whenever possible, homeless households should be referred to ESG-CV. Lease holding tenants eligible for CERA should be assisted by CERA over other funding sources because the deadline to spend the money is shorter than other funding sources. Other funds may be considered for repurposing to better fit the situation of the community and to serve the homeless population.

ELIGIBLE COSTS QUESTIONS

How much of the admin funds can be kept by the fiduciary? And can admin funds be used to hire grant management staff by both provider agencies and by the fiduciary?

These decisions will need to be made at the local level.

Can we use the case management funds to provide tenant education, financial literacy/budgeting education?

This is allowable but based on the demand for EDP it is unlikely that CERA staff will have significant time available to provide case management beyond basic information and referral.

With the new staff, additional offices will need to be set up, can admin \$\$ be used for furniture, computers, etc...

Yes.

Is mileage an allowable CERA expense?

Yes, mileage is an allowable expense for admin.

Would accounting be billed under CM/staffing or admin?

Accounting must be billed under admin. Case management costs are for those directly involved with tenants/landlords and those supervising this process.

DOCUMENTS, RECORDKEEPING AND REPORTING QUESTIONS

If the payment is made to the tenant...who completes the W-9?

There will be no W-9 in this situation. CERA assistance is not considered taxable income for the tenant.

When is the Settlement Statement used and when is the Conditional Dismissal Order required?

The Settlement Statement is used for non-court cases. The Conditional Dismissal Order is required for court cases. The Settlement Statement may be used in addition to the Conditional Dismissal Order to provide additional details regarding payments.

Our CoC has one agency processing the rent payment and one agency processing the utility and internet payments. All payments are being made to the tenant because the landlord, utility and internet providers will not accept CERA payment. Does each agency need to complete the CERA Tenant Payment Statement?

Yes, each agency will need to complete the CERA Tenant Payment Statement for the assistance they are providing and send it to the tenant with the payment.

What will be the required documentation for admin costs? (our HARA rents space in a building and is required to submit ESG admin costs based on a formula and submit backup documentation – will the same be required of CRF?).

Admin costs can be sufficiently documented through the general ledger. Admin must be directly attributable to CERA program operations. Cost pools or other indirect ways of charging admin are allowable under ESG but not allowable under CERA.

Is there an FSR policy for the Program?

The FSR guidance is generally the same for CERA as it is for ESG (the FSR spreadsheet as the coversheet, general ledger, other supporting documentation). The one difference is that CERA does not require individual timesheets so long as the staffing costs are clearly outlined in the general ledger report. The schedule for submitting FSRs is in the CERA guidance document. Additional information will be sent to fiduciaries once the FSR spreadsheets are sent out.

Our Accountant is working on the fiscal end of our cases and when we entered the paper applications, we put in the full amount of the what the family was awarded included future rents. Our agency does not send out one check for the 3 months future rent. We make a payment every month to the landlord. Because of this, we still have payments that have yet to go out for future rent on cases we have entered and process. Our accountant wanted to know if this fiscal piece of the online portal has anything to do with the FSR's. Can you please clarify?

The FSRs are separate, so it is fine if the numbers do not exactly align to what is in your general ledger.

Does the fiduciary need to provide MSHDA any documentation from the subgrantee to set that agency up as a subgrantee?

No, MSHDA does not require documentation for subgrantees but there should be and MOU in place between the agencies.

Our grants management team was reviewing the program guidance and regulations for CERA and came across this piece about publications:

Publications. All publications produced with funds from this award must display the following language: "This project [is being] [was] supported in whole or in part, by federal award number [enter project FAIN] awarded to [name of Recipient] by the U.S. Department of the Treasury."

What is the FAIN for CERA?

FAIN is ERA0415. Name of recipient is Michigan State Housing Development Authority.

ONLINE SOFTWARE QUESTIONS

Will both the landlord and tenant be able to track the progress of the online application? For example, if the application is only waiting on a document provided by the landlord, will the tenant be able to see what is still missing and vice versa?

Yes.

Will attorneys be able to see what documents a tenant/landlord has or has not submitted?

Yes, Legal Services staff will have read only access for the system.

Will agencies have access to run reports from this system?

Yes.

Will the online portal be tracking expenditures and balances of assistance dollars for agencies for reconciliation with agencies' financial records?

Yes.

Can an entity combine the roles of the Workflow?

No. We can potentially look at skipping the reviewer step with the vendor, but for the most part the three-stage review process is pretty similar to how most agencies operated EDP.

Do processors and reviewers need to be separate people?

Processors and reviewers should be separate people if the agency has enough CERA staff to support these roles being filled by separate people.

When the applications are sorted and sent to the CoC can it be broken out to be sent to several providers involved in CERA in the CoC, for example by zip codes?

This may be a possibility. In general, each agency will have the ability to have an assigner. Key pieces of information will be provided to the vendor to determine which agency to assign cases to. Agencies will assign cases to their own staff.

We have tenants that applied in the portal when their case was non-court. They have contacted us to inform us that their case is now in court. We have had a few staff try to edit the application in order to have the eviction flag appear, but we have not been able to change it. Is there a way to edit this question on applications so the eviction flag appears when assigning cases?

This is not possible right now. The Reviewer can put a note in the case log to remind themselves it is an eviction case.

Can a tenant amend their application once it has been submitted? And if so, what are the steps?

No, the tenant cannot amend the application after it is submitted (neither can the landlord). If the application needs updates/changes, the tenant/landlord can communicate with the Reviewer and the Reviewer can use the 'edit' button to change parts of the application.

I have a case where the landlord sold the property right before the settlement agreement went out. The previous owners said they are not accepting payment because the new owners took over all of that. We have a new landlord application for the new owners, but do I need the tenant to go back through the app process again? Or can we just upload the new landlord

information to the portal and proceed with the original settlement? All the information in there right now is for the previous owner. We just aren't sure how to show all of this in the portal or if we can even override the old landlord information.

Upload the new landlord application and edit the landlord information in the portal to show the new landlord information. Include a note in the portal regarding the change in ownership.

Does the tenant see any of the information input into the portal by agency staff - like documents the agency adds, notes/audit log, or any changes agency staff may make on the application?

No.

Is there a way to see what assistance the tenant is requesting? Specifically, is there a way that the reviewers can see if a tenant is applying for utilities only?

If their rental arrears are zero and they included utility bills, they may be applying for utilities only, but a message should be sent to the tenant to confirm and let them know they are eligible for rental assistance.

Will the Settlement Statement and other documents be printable to mail to a paper-based landlord or tenant?

Yes.

How will the conditional dismissals be uploaded? Will legal services be expected to do that directly?

Conditional Dismissals should be sent to the HARA and they will upload into the online system.

How would the reviewers or whomever know that the tenant was represented by legal services?

The application will ask both the landlord and tenant if an eviction case has been filed in court, but not all tenants will be represented. It is not essential to know whether or not they are represented.

Can you clarify roles, how assigners and reviewers will work when 2 different agencies need to be processors? One for rent and one for utilities?

This will be covered in the online application training.

Will we need to enter the files for households found "ineligible" when we move to the online portal to give an accurate reflection of everyone seeking assistance?

Yes.

The Landlord application in the portal will not allow you to choose more than 12 months of arrears. Right now, we are at 13 months for a few clients (April 2020 – April 2021). How does this type of case get handled?

Enter the 12 months with the 13th month (in this case April) added to the first month. The most important piece of information for determining the rental arrears is the ledger. Agencies should use the ledger to determine the actual months and amounts of arrears, not how the landlord completes this part of the application.

Field for "Period lease end date" (on both tenant and LL side) is not applicable to many of our clients - no leases. Guidance for how to proceed?

The date entered in this field is not critical, it could be the end of the month or whatever the tenant and LL enter. The system does not compare the dates entered.

On the Employment Info and Annual Income tab, if the tenant hasn't completed the Yes/No for income types, should staff complete these based on what the tenant submitted in their documentation?

Yes.

Do we mark children who do not have income as Yes, the "income is self-attested"? We are completing that Yes/No question for all household members?

Children do not need to have the self-attested Yes/No marked. Household members over age 18 should.

What should be entered in these fields that are not present on paper version of application: employment date hired, work phone and fax #, .

If you do not have the employment address and contact information on the pay stubs you can use the home address/cell phone for the tenant. For the start date put 1/2021 if you do not have the hire date.

Will we be able to access the landlord applications that a tenant has not completed? We have had landlords ask about applications that we are unable to see if a tenant has not completed their portion.

In the Call Center role, you can see Landlord only applications in the 'Awaiting Tenant Info' tab.

On applications where the landlord will not accept CERA payments/will not participate, what parts of the Landlord Information tab should be completed by agency staff, if any?

The landlord tab does not need to be completed in this situation, but the Reviewer should add notes to the case that they attempted to contact the landlord and if they spoke with the landlord that should be in the note that the landlord opted-out of the program.

Can we have clarity on what amounts should be entered in the Landlord Contract Information section? Landlords seem to fill this out differently and our staff are having to edit it, but we want to make sure we enter the information correctly. We have been matching it to worksheets.

Rent Due... The date of the month the lease states the rent is due.

Rental Amount... The amount of rent the lease states is due each month.

Total Fees... Total rental arrears, late fees and court costs.

Total Amount Due... Total amount due does not have to be filled in. The Basic Information Tab is where the final amounts of assistance are to be entered. You don't have to worry about staff editing these parts if the landlord puts down things that don't match the ledger, etc.

Is there a proper procedure to document in the portal when the landlord does not complete the application and the payment goes to the tenant?

A Landlord Opt-Out button will be added soon to denote this, and it will carry forward to the Excel spreadsheet in the Fiscal role. Until then, agencies will need to put a note in the case that the landlord

has opted out. The Finance staff person will see that the landlord address areas are blank in the Excel spreadsheet and therefore know that the payment goes to the tenant.

Are the staff supposed to be entering the paper applications that we have as though they are the tenant? We are looking for more guidance than what was provided on the video.

Yes, agency staff should use the paper application and other application documents, income, etc. to complete the tenant application just like the tenants would fill it out themselves.

We have an issue with getting the Conditional Dismissal Orders from our local court. We were trying to take them as far as we could within the system for accurate reporting without finalizing anything. They have been paid - but we have not moved them into an 'event' yet due to the lack of the CD in the file - should we complete the final fiscal approval anyway?

If you have a signed or unsigned copy of the conditional dismissal that has not been processed by the court, you can just upload that CD into the Supporting docs and move the cases through the fiscal process. If you have paid on the cases, we'll need you to do the fiscal process on these cases by the monthly deadline even if you do not have CD for upload.

A client selected "OPT-OUT UTILITY ASSISTANCE" while completing their application through the portal, however is now requesting utility assistance. There is no way for the reviewer to edit this in the portal, however we are still able to enter the utility assistance information in the basic info tab. Is this going to affect our payment or reporting with the "opt out" selected?

It is fine to provide utility assistance at this point—just make sure the areas on the Basic Information tab are completed and the utility documents are in the supporting documents.

Can I pull more than once for payment under the same event? I have a few of our payments in the system ready for me to complete the financial piece, but not all of them are approved yet. Can I pull the ones that are approved now under the event, and then once the others are approved, pull those under the same event? Or do they all need to be pulled at the same time?

Payment events can only include cases that are approved and after the payment event is approved you cannot add new cases to that event. You can make another payment event with the same payment date (or a different date) with the additional cases.

I have a question related to the "Payment Event" screen. Must all four steps of the payment plan (start payment event, pending review, pending approval, and payment log) need to be completed before the expenditure to show up properly on the reports?

Yes, you must get to the step of being able to export the excel spreadsheet for the Fiscal process to be complete.

We have another agency paying utilities. When I pull the rents for my agency to pay, does this also pull the utilities? Can 2 different agencies pull the same person?

The utilities/rent must all be approved before the case is processed in Fiscal. The spreadsheet that can be exported when the cases are fully processed in fiscal can be distributed to both agencies finance staff to facilitate payment.

The portal for one of our clients has 1 more month in the system than we have actually paid yet. Can I pull all but 1 months rent?

The fiscal spreadsheet shows all the payments that are identified in the Basic Information Tab. It can only be pulled once and it is not a problem if you have not yet paid all the future rent yet.

We have a few paper applications that rent and utilities were not paid in the same month. How do I handle these with a payment event? Do I use the month end date of the last month the payment went out?

It is fine to record these payments based on the last payment date. It is ok if the total amount does not align with the general ledger.

MONITORING QUESTIONS

Will the sub-grantees be audited independently for this program? Or will the fiduciary (as the assumed only grantee) be responsible for the compliance and records of the sub-grantees?

The fiduciary will be responsible for the compliance and records of the sub-grantees. MSHDA will be doing tenant file reviews starting in April/May to assess agency compliance with federal and state program guidelines.

If the fiduciary is responsible for subgrantee records, would it be a best practice for the fiduciary to also complete random tenant file reviews or is MSHDA's review all that is required?

This is up to the grantee. Tenant file monitoring is not required for sub-grantee monitoring but is allowable if the fiduciary wants to do it.

If MSHDA does not require a fiduciary to conduct subgrantee tenant file reviews, will MSHDA then not hold the fiduciary responsible for funds expended by a subgrantee that are later determined by MSHDA not to be in compliance with the CERA program?

MSHDA recommends that fiduciaries monitor the work of subgrantees. Section 28 of the MSHDA CERA Grant Agreement stands regardless of whether or not the fiduciary chooses to monitor the work of the subgrantee.

We are working to audit our sub-grantees to make sure that the files are hitting the expected quality. We wanted to ask if there is an ability for us to get access to their files that have been completed in the system, or if we would need to have them print the appropriate client documents?

The person doing the file reviews will need to be assigned to the subgrantee as an assigner and then they will be able to look at "All Applications" and click on the cases so that they can review the case.

Will there be a federal audit of the agencies after the program has ended?

It is unknown at this time what type of additional auditing may take place.