

# ERAP 2.0 Information Meeting

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EVICTION RENT ASSISTANCE PROGRAM TEAM  
OFFICE OF FAMILY & ADULT HOMELESSNESS  
HOUSING ASSISTANCE UNIT

SEPTEMBER 9, 2021



Washington State  
Department of  
**Commerce**

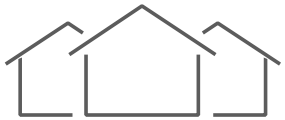
# Housekeeping:

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- This call is being recorded.
- PowerPoint slides and Zoom recording will be posted on Commerce website.
- Link will be sent to all lead grantees.

# We strengthen communities

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**HOUSING  
HOMELESSNESS**



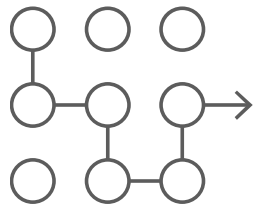
**INFRASTRUCTURE**



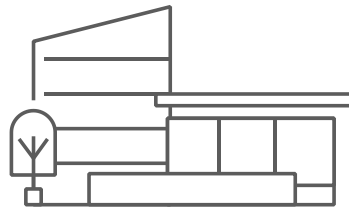
**BUSINESS  
ASSISTANCE**



**ENERGY**



**PLANNING**



**COMMUNITY FACILITIES**



**CRIME VICTIMS &  
PUBLIC SAFETY**



**COMMUNITY  
SERVICES**

# Ice breaker and poll

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*What's one thing that brings you energy and joy?*

Put it in the chat!

T-RAP Application Status poll

# Agenda

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- Welcome
- Ice breaker
- Quick poll
- ERAP 2.0
  - What we're proposing
  - What we've heard about T-RAP
  - ERAP 2.0/T-RAP Crosswalk
  - Challenges
  - Why switch
  - Questions to date
  - Next Steps

# What we're proposing

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Commerce was appropriated \$403,000,000 of the Coronavirus State Fiscal Recovery Funds (CSFRF) last session.

Instead of embedding these funds into the existing T-RAP contracts, we created a rent assistance program modeled after the original Eviction Rent Assistance Program (ERAP) in order to fully utilize the flexibilities of this funding.

The new program is called ERAP 2.0 and the funds are available through June 30, 2023.

This funding is available to your county with a October 1 start date.

# What we've heard

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- Navigating the Treasury program requirements is complicated and time consuming, impacting the ability to make payments quickly
- Treasury has changed program requirements multiple times since the program started, making it difficult to pivot quickly while still ensuring services remain open
- T-RAP reporting requirements
  - have changed four times in the last 6 months and will change again soon requiring back logging data since the beginning of the program, this is really stressful and takes staff time away from serving households
  - the tight turn around for Report Forms is difficult
  - the reporting requirements change frequently
  - the required data elements are confusing and difficult to track
- Not enough Admin or Operations funds provided
- Complicated rules around documentation

Program	Eligibility & Documentation	Allowable Expenses	Other
T-RAP 1.0	<ul style="list-style-type: none"> <li>• 80% AMI or less, financial impact during COVID, at risk of homeless or currently experiencing housing instability</li> <li>• Must prioritize 50% AMI and unemployed</li> <li>• Self-attestation allowable to document eligibility, but must be re-verified every three months if used for income</li> <li>• Must collect documentation of rental payment amount and address (lease)</li> <li>• Assistance back to March 13, 2020</li> </ul>	<ul style="list-style-type: none"> <li>• 15% admin which includes indirect costs</li> <li>• Rent and utilities</li> <li>• No future utility payments</li> <li>• Other Housing Costs allowable if related to the COVID-19 pandemic</li> <li>• Payments can be made to households</li> <li>• Up to 15 months of assistance allowable</li> </ul>	<ul style="list-style-type: none"> <li>• Complicated reporting requirements</li> <li>• Report Forms due on the 7<sup>th</sup> of each month</li> <li>• Same performance measures</li> </ul>
ERAP 2.0	<ul style="list-style-type: none"> <li>• Current Income 80% AMI or less, have missed/past due rent payment since March 1, 2020 and still occupying residence</li> <li>• Eligibility can be self -certified, does not require additional documentation or re-verification</li> <li>• Assistance back to March 1, 2020</li> </ul>	<ul style="list-style-type: none"> <li>• 15% Admin</li> <li>• Operations – no cap</li> <li>• Rent and utilities only</li> <li>• Internet can be covered without being related to pandemic</li> <li>• Future utility payments allowable</li> <li>• Payments must be made to landlords</li> <li>• No cap on number of months of assistance</li> </ul>	<ul style="list-style-type: none"> <li>• Simplified reporting requirements</li> <li>• Report forms due on the 20<sup>th</sup> of each month</li> <li>• Same performance measures</li> </ul>



# Challenges with this plan

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- **Some county's require a competitive process to determine a sub grantee to administer the new contract.**
  - We can help write a letter to your executives explaining that the program intent is the same, we're viewing this more of a fund switch, and urge to grant an exemption in order to keep rent assistance program open continuously.
- **You've spent a lot of work standing up T-RAP already.**
  - You have worked really hard on T-RAP. Standing up ERAP 2.0 will be a heavy load in the beginning for what we think will be a large pay out later. We can help train your direct service staff on ERAP 2.0 program guidelines and forms.
- **You'd have to amend By and For subcontracts since it's a different fund source.**
  - How can we help you with this?

# Why should we switch to ERAP 2.0

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- **ERAP 2.0 creates additional flexibilities with the following:**
  - **No cap** on number of months of assistance
  - Future utility payments allowable
  - Can **use self-decs** for eligibility documentation **without additional restrictions**, like having to re-certify someone every 3 months
  - Self-decs embedded in Household Info and Eligibility Doc
  - **Simplified** reporting requirements due at a **reasonable** date
  - A **higher cap** on Admin
  - An Operations budget category **that is not limited**
  - **Consistency**, a commitment to mitigate the amount of mid contract program changes as necessary

# Questions/concerns so far

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- **If we do apply for ERAP 2.0 and decide to opt-out of TRAP how will Commerce determine the de-obligation amount and when will that occur?**
  - We would deobligate your entire unspent T-RAP 1.0 award in mid to late October.
- **If our County's legal counsel does not support the transfer of funds from TRAP to ERAP for provider contracts what can Commerce do to support that process? (i.e. write a letter stating the programs are intended for similar purposes/acknowledge Commerce's role in the condensed timeline for transition from TRAP to ERAP, etc.)**
  - We would do whatever we can to help with this. Please let us know what we can do be supportive and I will let you know if any of what you ask for presents a problem for Commerce but certainly we could write a letter explaining the difference and similarities between the two programs and why we are suggesting the change.
- **While the ERAP 2.0 funds come from Covid relief packages, there is no requirement to make a connection to Covid or being impacted by the pandemic?**
  - Correct. We hope this makes it easier to help more folks. While there is no requirement that the household be COVID impacted, the rent assistance provided must be as of March 1, 2020 or after (when the pandemic was officially declared).

# More q's

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- **How is changing the majority of grantees to ERAP 2.0 going to ensure better T-RAP data quality?**
  - Grantees have really struggled to understand and meet the T-RAP reporting requirements. Report Forms are turned in late every month because of the unreasonable due date. A smaller number of T-RAP specific grantees allows us to provide more thorough technical assistance to them on the definitions of the data elements so that there is more shared understanding around what's being asked and submitted.
- **If these changes are partly due to the multiple program changes made by Treasury since program start, is Commerce stating that they will not be making large program changes to ERAP 2.0?**
  - We are modeling ERAP 2.0 after ERAP 1.0. The kinks are largely worked out of that program at this point. We do not anticipate large program changes.
- **How is switching fund sources with grantees going to protect the state from audit risk?**
  - There is generally more audit risk with a more complex program. T-RAP is complex, ERAP 2.0 is simple. The increased flexibility also allows for grantees to get payments out without extensive restrictions which makes it easier for grantees to comply in a way that reduces audit risk. We have simply gathered enough information on the current state of T-RAP to understand there are risks. The fewer grantees managing complex funding with complicated requirements, the more cohesion in program administration and implementation around the requirements.

# Next Steps

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Opt-in to ERAP 2.0 in place of T-RAP by 9/16

Complete ERAP 2.0 application by 9/23

Need help? Have questions? Contact us!



# Thank you!



Washington State  
Department of  
**Commerce**

[www.commerce.wa.gov](http://www.commerce.wa.gov)



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