

Federal Emergency Rental Assistance Program (RentReliefRI) PROGRAM
ADMINISTRATIVE PLAN
7.27.23

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I. Overview and Purpose

The Federal Emergency Rental Assistance (ERA) program, referred to as RentReliefRI, is a U.S. Department of Treasury funded rental assistance program administered by Rhode Island Housing and Mortgage Finance Corporation (RIHousing). The program was established by section 501 of Division N of the Consolidated Appropriations Act, 2021, Pub. L. No. 116-260 (Dec. 27, 2020) (the Act).

The purpose of the RentReliefRI program is to assist families who need temporary help paying rent, rent arrearages, utility arrearages, utility payments, and other expenses (ex; relocation expenses, late fees, etc.) related to housing.

II. Duration and Term

The RentReliefRI program is a temporary program with a funding expiration of September 30, 2025 for ERA2 funds. Assistance not to exceed 18 months of assistance.

III. Application

Any individual/household wishing to receive Rent Relief RI assistance must apply for admission to the program using the online RentRelief portal. Tenants with an evictions summons can meet with a Tenant Representative from Rhode Island Legal Services or Center for Justice at the Court House located outside the eviction hearing courtrooms or by appointment. Applicants, regardless of eviction status, will also be able to apply online at www.rihousing.com/epri. However, active evictions will continue to be prioritized.

We will not accept hard copy applications for this program. If a tenant is finding it challenging to complete their application they can reach out to RILS or CFJ for assistance. If they are having technological difficulties they may email epri@rihousing.com for assistance.

Applicants will be assisted promptly and courteously with the RentReliefRI application process.

A tenant application must be complete, and all required documentation received to be considered for approval and payment. In progress applications will remain open for 10 days. If after 10 days, the applicant has not completed the application, the application will be deemed inactive for reporting purposes and efforts to reach the applicant will cease. A notice will be sent to the email account of the tenant and and/or the tenant representative used to create the account notifying the applicant that their account has been denied, no appeal allowed, due to lack of applicant response. Applicant must re-apply if they want to be considered again.

In general, landlord/property manager participation is required in order for an application to be complete and submitted for review. If the landlord fails to complete their portion of the application after 3 attempts by phone , text or email over a 5 calendar-day period beginning the date application creation at the court, the landlord will be considered to not be participating and the tenant will be given the option to receive payment directly.

Upon accepting RentReliefRI assistance, landlord must agree to dismiss eviction proceedings for the months in which they have agreed to accept assistance. If an eviction has been filed for reasons other than non-payment of rent and a landlord agrees to accept the assistance, they must dismiss the eviction case and agree not to file for the months the tenant is receiving assistance. If the landlord chooses not to participate, RentReliefRI can offer applicant direct payment assistance upon receipt of a direct payment agreement..Applicants receiving direct payment will need to provide a receipt showing funds were used for intended purposes before they will be considered for additional funding through the recertification process. Direct payment will only occur if all other efforts to pay the landlord have been exhausted. Landlords participating in the program may still evict for cause; noncompliance under R.I. Gen. Laws § 34-18-24 that affects health or safety.

IV. Eligibility

1. Tenants:

Eligible households must:

- Be Rhode Island residents
- Obligated to pay rent
- Attested to a Covid Hardship
- Demonstrate a risk of experiencing homelessness or housing instability. Past due rent or utility bills or any evictions summons will satisfy this requirement or checking off as risk of housing instability on Covid Attestation if no past due bills or summons exist.
- Have a household income at or below 80 percent of Area Median Income (AMI). A household is typically the members listed on a lease with the exception of sub-lease agreements. If a landlord writes a statement that a person who is listed with other household members, is responsible for only a portion of the total rent and will be protected from eviction while participating in the program, even when other

members are subject to eviction, then we will consider that person its own household.

- Compliant with the current lease or tenancy, except for being unable to pay rent AND
- Must not have obtained rental assistance for the same expenses from other sources duplicating the assistance being requested under this program (ESG/Housing HelpRI/Safe Harbor/CoC/HOME, Back to Work, etc.)
- Applicants that previously received Rent Relief will only be eligible for the difference between 18 months of assistance and the number of months previously received.

2. Landlords/PropertyManagers:

Eligiblelandlords must:

- Demonstrate ownership of the property;
- Supply W-9 and bank information (for electronic payments);
- Be able to demonstrate arrearages are owed;
- Agree not to pursue a non-payment of rent eviction against the tenant while receiving assistance through this program and to not pursue an eviction for other than non-payment of rent unless there is a noncompliance under R.I. Gen. Laws § 34-18-24 that affects health or safety;
- Agree that once payment is received, they authorize the Court to dismiss the eviction, if applicable. This is done through a signed certification.

V. Prioritization:

RIHousing is required to prioritize serving families that meet certain criteria by using a prioritization system. Applicants with an active eviction summons filed against them will receive the highest priority level. Applications will be assigned to an auditor to begin working on based on their priority level. The higher the level, the earlier the application will be assigned and therefore the potential to be paid out earlier than those with lower priority. RIHousing is also permitted to establish other priorities, at its discretion. RIHousing will prioritize the following applicants:

Priority 1

Applicants with a risk of eviction AND that have an AMI at or below 50% AMI AND that have been unemployed 90 days or more will be given a priority level of 1. Risk of eviction will be defined having a court issue summons that an eviction has been filed or received notice of a utility disconnection.

Priority 2

Applicants with a risk of eviction AND an AMI at or below 50% will be given a priority level of 2.

Priority 3

Applicants with an AMI at or below 50% AND that have been unemployed 90 days or more will be given a priority level of 3.

Priority 4

Applicants with an AMI at or below 50% will be given a priority level of 4.

Priority 5

Applicants with an AMI between 50-80% will be given a priority level of 5.

Priority Status

VI. Eligible Assistance

Eligible forms of assistance are as follows:

- **Rental Assistance**

Eligible households may apply for assistance to cover past due rent that was incurred beginning April 2020 and may receive up to 18 months of assistance subject to funding availability, inclusive of up to 3 months of forward-facing rent. The number of months is calculated based on the dollar value divided by base rent, not date of when the assistance covers. Assistance must be provided to eliminate an eligible household's past due rent before the household may receive assistance for future rent payments. Past due rent balances for months prior to April 2020 will not be considered eligible expenses. If assistance requested is 15 months or under, applicant will automatically be eligible for 3 months forward facing rent.

Tenants of PHA's and/or that utilize a Section 8 voucher are NOT eligible for forward facing rent.

To qualify for additional RentReliefRI rental assistance after initial receipt of past due rent and at the expiration of the 3 months forward facing rent all applicants must recertify if funds are necessary to ensure housing stability in order to be eligible for additional assistance. To prove that additional funds are needed, the applicant must still be income qualified and will be required to update their income documentation. If declaring Zero Income, a Zero Income attestation must be completed that demonstrates how household expenses are being paid. If tenant is QCT eligible, a self-attestation of income will be accepted if documentation is not available. If not QCT and no documentation is available a self attestation plus bank statement or other demonstration of income will be requested. Recertification applications can be submitted no more than 30 days prior to funding expiring. In addition, if tenant received direct payment, proof that rent was paid MUST be provided prior to recertification.

If the applicant qualifies, the applicant will receive funds to cover any past due arrearage accrued since last assistance was issued and can be eligible for an additional 3 months forward facing rent up to a max of 18 months.

- **Rental debt owed to previous landlord**

If an eligible applicant would like to use some or all of their months of assistance to clear an old rental arrearage incurred during the eligible timeframe for a unit that they've vacated, they will be allowed to do so. The months of assistance will be counted towards the total number of months assistance the tenant received even if it was for a previous landlord and tenant must acknowledge their understanding of that fact and agree to participate. Public Housing Authorities will not be eligible to receive past due rent from former tenants.

- **Security Deposits**

Security deposit assistance will not be available in this version of the program.

- **Utility Assistance**

Utility and home energy costs are charges related to the occupancy of rental property. Accordingly, utilities include separately-stated electricity, gas, water, trash removal and energy costs, such as fuel oil. **The internet stipend was discontinued as of August 3, 2022.** Telecommunication services (telephone, cable) delivered to the rental dwelling are **NOT** considered to be utilities. Utilities that are covered by the landlord/property manager within rent will be treated as rent. Eligible households may apply for assistance to cover past due and current utility balances that were incurred beginning April 2020 and may receive up to 18 months of assistance for each utility. Existing utility arrears that could result in service shut off is prioritized. Assistance must be provided to reduce an eligible household's utility arrears and will not be eligible for forward facing utility assistance. Utilities will be covered via a monthly stipend of \$150 for Electric and \$100 for Gas. 18 months of assistance is available per utility. The number of months used on prior cases if not specified within the previous case will be calculated using the stipend values and deducted to determine remaining months of eligibility. Most recent utility bill must be provided and the either the # of eligible months x Stipend value will be paid if less than invoice balance or Invoice Balance if # of eligible months x stipend value is greater.

Those residing in properties owned by Public Housing Authorities or who are participants in the HCVP program will have their utility allowance deducted from existing eligible balance to calculate allowable assistance per Treasury rules.

- **Other Expenses**

a. Relocation Expenses-Includes relocation expense and rental fees if a household has temporarily or permanently been displaced due to COVID or extenuating circumstances such as fire(as detailed in U.S. Department of the Treasury Emergency Rental Assistance Frequently Asked Questions No. 26 states that :“The cost of a hotel or motel room occupied by an eligible household may be covered using ERA assistance within the category of certain “other expenses related to housing”

- a. Accrued late fees as specified in lease agreement (if not included in rent arrearage). A max of \$150/month in late fees are eligible.
- b. RentReliefRI will cover the one-time cost of up to three months of eviction-related moving and storage fees for applicants that meet the eligibility requirements of the program. If an applicant misses their scheduled appointment to pick up their belongings, they will not be able to reapply for this assistance. Moving costs will be paid on a reimbursable basis after receipts from a moving company are submitted. Storage fees will be paid directly to the storage facility. These expenses are not eligible for direct payment to the tenant.

VII. Income Eligibility Determination:

The Program is available to Rhode Island renter households with incomes at or below 80% of Area Median Income as defined by HUD.

Income eligibility may be determined in one of two ways:

- either the household's total income for the most recent calendar year taxes were filed(either 2022 or 2021 if 2022 taxes have not yet been filed) as defined by HUD's definition of annual income in 24 CFR 5.609 OR adjusted gross income as reported on

IRS form 1040, the household's monthly income (last 30 days) at the time of application extrapolated over 12 months; eligibility must be redetermined every three months if income determined in this way

- RI Housing may use discretion to determine income using HUD's definition or adjusted gross income as reported on form 1040, based on what is most advantageous to the tenant.
- Applications for ERA3 will use 2023 HUD Income Limits

The following are included in the income determination

- Gross earned income including wages, salaries, overtime pay, commissions, fees, tips and bonuses, payments in lieu of earnings, including unemployment benefits, TDI, TCI, social security disability, pensions, annuity, investment income, rental property income, workers compensation, and severance pay; see 24 CFR 5.609 for a full list of eligible types of income (https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:1.1.1.1.5#se24.1.5_1609)
- Net income from operation of a self-employed business or profession as determined by tax returns;
- Periodic and determinable allowances such as alimony and child support payments; and
- RI Works Benefits.
- If a household reports zero income, they will be required to submit a Zero Income Attestation form including information demonstrating how they pay household expenses.
- If a household is unable to provide any supporting documentation options to verify their income, they will be required to complete an income self-attestation document but only if that is combined with being QCT eligible. QCT will be an extra layer of income verification, but the default will be to collect income documentation in all cases whether QCT or not.
- If a tenant is NOT QCT and unable to produce any income documentation, they must complete the income self-attestation as well as provide a bank statement showing recent income.

The following are excluded from the income determination:

- Income from employment of children under 18 years of age, payment received for the care of foster children, inheritances, insurance payment, income of a live-in aide, student financial assistance (See 24 CFR 5.609 for an additional list of exclusions) (https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:1.1.1.1.5#se24.1.5_1609)
- SNAP payments
- Economic Impact Payments (stimulus payments) are not included in the income determination.
- Federal Pandemic Unemployment Compensation (FPUC) (the additional \$300 through August) is not included in income determination; however, regular state Unemployment Insurance and CARES Act PUA & PEUC extensions of regular UI are included in income determination.

Households in a federally subsidized residential or mixed-use property may receive assistance

as long as costs have not been or will not be reimbursed under any other federal assistance. If household receives a monthly federal subsidy, AND the tenant rent has been adjusted according to changes in income, the household may receive assistance for the tenant-owned portion of rent or utilities that is not subsidized. RIHousing will rely on most recent income certification from the PHA or Management Agent as proof of income, which must be dated within past 12 months. Families in Section 8 receive an annual income recertification unless there is an income change. At that point they would get an interim recertification (form 50058 50059) Tax credit developments may also certify families using a "Tenant income Certification" (TIC). These forms can also serve as income verification. Residents of public housing are NOT eligible for forward facing rent. May rely on attestation regarding duplication.

VIII. Evidence

1. Tenants

Verification of legal identity may be demonstrated through:

- A government issued ID or Driver's License for the applicant (address/info does not have to be current as this is to verify identity, not residence).
- Any other verifiable records or information that establishes applicant identity.
- If a photo ID is not available, a self-certification of identity/waiver will be granted with explanation detailing why this documentation is unavailable.

How to Demonstrate your Rental Cost:

- A current lease agreement; in lieu of signed lease agreement, documentation that establishes a pattern of rent; any document from the courts regarding an eviction proceeding can substitute for a lease agreement.
- If lease agreement has expired, lease converts to periodic tenancy with landlord's consent.
- Applicants under a sublessee agreement are eligible to apply for assistance. A formal sublease agreement must be in place and both the sublease agreement and lease agreement must be provided. The lease agreement must specify that sublets are allowable. Sublessor would be required to provide a w9 and banking information in the same manner a landlord would.
- Any other verifiable records or information that establishes applicant rental amount.
- Roommates/ Shared living of non-related people - We need a signed lease agreement and proof of history of rent payments to landlord. If the request is for Student /shared housing, we can use the rental agreement. If the lease has multiple tenants but the applicant is applying for their share of rent, we need to ask the landlord to sign the roommate agreement to protect the tenant we are assisting in the event the other tenants do not pay their portion of rent before issuing payment to them.
- Cohabiting applicants and landlords – We need a signed lease agreement and proof of history of rent payments to the landlord for at least 3 months prior to being past due on rent (ideally cleared checks, money order receipts or proof of electronic payment).

If a member of the applicant household is related to the landlord/property manager or an employee of the landlord/property manager, RIHousing has determined that (i) a written signed

lease, and (ii) evidence of rental and utility payments must be provided, along with (iii) evidence that the landlord's unit address is different from the tenant's unit address to verify that a rental household exists.

Income Eligibility/Verification:

- Source documents evidencing income over the last 30 days (e.g., wage statement, W-2s or 1099's tax filings (if using w-2's or 1099 must also submit income self attestation), interest statement, unemployment compensation statement, bank statement- screenshots are acceptable as long as the name is visible; or
- A copy of Form 1040 as filed with the IRS for the household (pages 1 and 2 signed, or receipt of e-file)- must be calendar year 2021 or 2022; 2020 no longer accepted
- Attestation from an employer
- Evidence that applicant is currently receiving SNAP, RIWorks, Child Care Assistance Program, Public Assistance, LIHEAP or Social Security Income Supplemental or other state assistance where income eligibility requirement is the same or lower than the income eligibility threshold for RentReliefRI. Any other verifiable records or information that establishes income. Must be dated within 1 year.
- If an applicant's household income has been verified to be at or below 80% AMI in connection with another local, state or federal government assistance program, RIHousing is permitted to rely on a determination letter from the government agency that verified the income as long as the determination was made within the last year.
- Copy of unemployment weekly re-verification letter stating weekly benefit amount to demonstrate last 30 days of income.
- If every member of the applicant household over 18 years of age certifies that they have no income, they will each need to attest to that on a self-attestation form.

By submitting an application, an applicant attests that they have disclosed to the RentReliefRI program a full accounting of all sources of income for the household and that they do so under the pains and penalties of perjury.

Any person who knowingly makes a false claim or statement in connection with a federal program may be subject to civil or criminal penalties, including those specified under [18 U.S.C. 287](#), 1001 and [31 U.S.C. 3729](#)

RIHousing may waive income documentation requirements. This waiver is designed to accommodate disabilities, extenuating circumstances related to the pandemic or a lack of technological access. If a household is not able to provide documentation for all or a portion of their income, RIHousing may accept a self-attestation only at the discretion of the program supervisor. In these cases, income must be reassessed every three months. Waiver determination must be documented.

Qualifies for Unemployment:

Demonstration of unemployment will be used in calculating income but is no longer a determining factor in establishing hardship. It will weigh into the assignment of a Priority Level.

- Unemployment Compensation Statement;
- Verification of unemployment eligibility received from RI Department of Labor

- and Training;
- Bank statements showing unemployment direct deposit.

Demonstrates a risk of experiencing homelessness or housing instability:

- Past due utility or rent notice or eviction notice or check off of housing instability on Covid Attestation if no past due bills are available
- Unsafe or unhealthy living conditions. This determination may be made through documentation of code violations cited by City/Town. For applicants currently living in subsidized housing, evidence of a failed Health and Quality Standards inspection with exigent health and safety items and/or a Real Estate Assessment Center inspection with health and safety items.
- Any other verifiable records or information that establishes this risk
- Federal rules governing Rent Relief require that eligible tenants have experienced a financial hardship due to or during covid, directly or indirectly. All applications will be required to have a completed Covid Attestation Form on file.

Rental Arrearage

- Eviction Hearing Notice
- 5 Day Demand Notice
- Communication from Landlord/Property Manager stating rental arrearages
- Arrearage must begin April 1, 2020 or after
- Any other verifiable records or information that establishes rental arrearages.
- Can still be eligible if not in arrearage but enrolling for prospective benefits; however, arrearage must be paid prior to prospective payments; limited to 3 months prospective payments subject to remaining funds AND subsequent application for assistance not to exceed 18 months.

Utility Arrearage

- Past Due Utility Bill (s) for each month of arrearage or account activity statement showing bill and payment data or auditor verification of documentation of arrearage and current bill amount
- Termination of service notice
- Must differentiate between electric, gas, water, trash removal and energy costs.
- Verification of current bill and arrearage received from the utility company
- Any other verifiable records or information that establishes utility arrearages and current charges.

Other Housing Costs

- Copy of rental ledger or notice from landlord demonstrating a late fee, cleaning or pet fee, lockout fee or other similar charge (cannot already be included in rental arrearage or built into standard rental fee)
- Receipt or agreement from licensed insured moving company that demonstrates an incurred relocation expense (must include starting and ending destination address)

Landlords

Any combination of verifiable records or information can be used to demonstrate landlord eligibility:

- Proof of ownership (mortgage or mortgage bill, tax bill, water/sewer bill, home insurance bill, real estate tax bill, etc.); if this cannot be supplied by owner, case auditors can use tax assessor's database to verify information and document
- Landlord/Property Manager W9; if not signed, a revised w9 can be requested after approval
- Landlord/Property Manager Bank account information
- If not received from the tenant, verification of non-payment of rent (notice of nonpayment, letter from landlord/property manager, rent ledger)
- The landlord/property manager will attest that they have not received other rental assistance for the same months and charges.
- A copy of management agreement is required when payment goes to the property management company, but lease agreement is between the owner and tenant. If formal management agreement is not in place, documentation showing a pattern of payment history between management company and tenant will suffice.

IX. Program Integrity

All program participants will be reminded that they must not knowingly:

- Make a false statement in connection with a federal housing program [18 U.S.C. Section 1001].
- Commit fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program [24 CFR 982.552(c)(iv)].
- RIHousing will place a warning statement about the penalties for fraud (as described in 18 U.S.C. 1001 and 1010) on key program forms and form letters that request information from an applicant.
- RIHousing routinely will use sources of up-front verification. At any time while assistance is provided, current information provided by the applicant may be compared to information provided from private or public databases available to identify inconsistencies and incomplete information.
- RIHousing may investigate possible instances of error or abuse using all available RIHousing and public records. If necessary, RIHousing will require applicants to sign consent forms for the release of additional information. In the case of applicant-caused errors or program abuse, the applicant will be required to repay any excess assistance received.
- **Quality Assurance**
 - RIHousing Internal QC staff will randomly select approved applications to review for compliance with program guidelines, policies and procedures and accuracy (RIHousing staff and partner agencies). Any findings will be discussed with Program management and as needed; management will take necessary corrective actions.
 - The Program QC team will review reports and system data monthly for the following:
 - Any unusually large award amounts
 - Multiple awards to the same address and/or applicant
 - Any unusual data patterns

- **Contractor Program Participation**

Any Contractor working on RentReliefRI shall establish a policy prohibiting its employees from participating in any decision-making (including review or processing an application) regarding a project or program that could result in a direct benefit to them or their immediate family. "Immediate Family" includes employee's spouse, child, parent or sibling, including their child, parent or sibling by marriage or adoption. Employees (and immediate family members) otherwise eligible to receive assistance under such project or program may apply through RIHousing (or another participating agency, at RIHousing's direction) to prevent any activity or interest that is in conflict with the employee's official duties.

- **RIHousing Employee Program Participation**

RIHousing employees and their family members shall be governed by RIHousing's Employee Participation Policy and Code of Ethics

X. Notification of Denial:

An applicant will be denied participation in the Program if the applicant does not meet RentReliefRI specific criteria, including income eligibility. Participation will also be denied if the RentReliefRI applicant does not provide complete and true information that RIHousing determines according to Treasury guidance is necessary in the administration of the program.

XI. Reviews and Appeals

Effective August 29, 2022, RIHousing will no longer offer informal reviews to applicants for whom assistance is being denied due to program ineligibility. This is not applicable to applicants denied due to being over income. In these cases, a request for an appeal must be made via the "Appeal" button referred to in the denial email no later than 10 business days (unless able to demonstrate proof of extenuating circumstances that prohibited you from making contact within that timeframe) from the date of RIHousing's denial of assistance. RIHousing will review the details of the appeal and send an email notice of the informal review within 10 business days of the applicant's request. Case status listed as denied for any other reason besides over income have no means to appeal or to request an informal review or hearing.

Notice to the Applicant:

RIHousing must give an applicant prompt notice of a decision denying assistance. The email notification contains the option for an applicant to appeal only in cases that are denied for being over income. Cases denied for non responsiveness will be denied without option for appeal. At that point applicants must reapply and will be put back in the queue.

XII. Payment:

Primarily, payment will be made directly to the landlord/property manager by electronic transfer of funds to the account provided and verified by the landlord/property manager or via paper check. Upon payment, applicant will be notified by email that their landlord/utility provider has been sent payment.

In the event the landlord refuses to participate in the program, payment may be made directly

to the tenant for the sole purpose of using the funds to make their housing payment. In these instances, three outreach attempts will be made to the landlord within five days OR the landlord will verbally, or in writing, state that they do not intend to participate in the program to a RentReliefRI representative. The representative will document this in the notes section of the case.

Tenant will be required to sign an attestation stating that they understand the allowable uses of the funds and the consequences of not using the fund in that manner.

Payment will be made by check and mailed directly to the tenant at the address listed on their application. All utility payments will be paid directly to the utility provider. RIHousing will submit payment to the vendor via check with name, address, and account number for the customer so that payment is credited accordingly. The tenant is required to provide proof of payment to landlord within 15 days of receiving the funds to Rent Relief. If not provided at time of recertification the recertification case will be denied.

XIII. Reporting

The following data will be collected from applicants and retained in order to comply with Treasury and State reporting requirements.

- Address of the rental unit
- For Landlords/Property Managers and utility providers, the name, address and SSN, tax identification number or DUNS number
- Amount and percentage of monthly rent covered by the assistance
- Amount and percentage of separately stated utility and home energy costs covered by assistance
- Total amount of each type of assistance provided to each house (*i.e.*, rent, rental arrears, utilities and home energy costs, utilities and home energy costs arrears, and other expenses related to housing incurred due directly or indirectly to the COVID-19 outbreak);
- Amount of outstanding rental arrears for each household;
- Number of months of rental payments and number of months of utility or home energy cost payments for which assistance is provided;
- Household income and number of individuals in the household;
- Gender, race, and ethnicity of the primary applicant for assistance.

Aggregate data may also be used for statistical analysis and to analyze trends. This data may also be collected as to the number of applications received so that acceptance rate can be determined. Treasury may require additional reporting requirements at a future date.

