

Federal Emergency Rental Assistance Program (RentReliefRI)  
PROGRAM ADMINISTRATIVE PLAN

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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, 2022. Unless the program is extended, the term of any rental assistance contract may not exceed September 30, 2022. Period of eligibility is from April 1, 2020 through September 30, 2022 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 rent relief portal located at [www.Rentreliefri.com](http://www.Rentreliefri.com). A landlord may also initiate the application process, which upon completion by the landlord/property manager, information will be sent to the tenant for verification and required documentation.

We will not accept hard copy applications for this program. If an applicant is unable to submit an application for any reason, a partner agency in the geographic area will reach out to make accommodations. To ensure that the program and application are accessible to everyone including those with limited English language proficiency, those that live in traditionally difficult to reach communities, those who might not have access to or struggle with technology, those who need assistance in completing the application, and other groups who might not typically apply for assistance, RentReliefRI, through a network of partners, will make available assistance that includes: on-site, in person assistance; assistance by phone and email; language support.

Applicants will be assisted promptly and courteously with the RentReliefRI application process. Staff is required to verify the identity of an applicant before discussing any information in an application with applicant in addition, the RentReliefRI program will develop and implement an affirmative marketing and outreach plan to ensure that traditionally difficult to reach communities are made aware of the program.

#### **IV. 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. During this time, RentReliefRI will make three (3) attempts to contact the applicant using the information provided by the applicant when they created their portal account. If after 10 days, the applicant has not responded and 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 used to create the account notifying the applicant that their account has been denied, no appeal allowed, due to lack of applicant response. Applicant may log back in to the portal and add a case under the "case" tab . Once this is complete, it will be added to the queue according to the prioritization criteria.

In general, landlord/property manager participation is required in order for an application to be complete and submitted for review. Once the tenant portion is complete, outreach to the landlord/property manager will be initiated. Outreach to landlord/utility provider will be considered complete if (i) a request for participation is sent in writing, by mail, to the landlord or utility provider, and the addressee does not respond to the request within 14 calendar days after mailing; (ii) RIHousing has made at least three (3) attempts by phone, text, or e-mail over a 5 calendar-day period to request the landlord/property manager or utility provider's participation; or (iii) a landlord/property manager confirms in writing that the he/she does not wish to participate. The final outreach attempt or notice to the landlord/property manager must be documented.

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 eviction due to non-payment of rent 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 or applicant can be provided with assistance with security deposit and up to 3 months forward facing rent on a new unit. 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. Landlords participating in the program may still evict for cause; noncompliance under R.I. Gen. Laws § 34-18-24 that affects health or safety

## **V. Eligibility**

### 1. Tenants:

Eligible households must:

- Be Rhode Island residents
- Obligated to pay rent
- Qualify for unemployment benefits or have experienced a reduction in household income, incurred significant expenses, OR experienced other financial hardship due, directly or indirectly, to the COVID outbreak
- Demonstrate a risk of experiencing homelessness or housing instability
- 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.)

### 2. Landlords/Property Managers:

Eligible landlords 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.

## **VI. Prioritization:**

RIHousing is required to prioritize serving families that meet certain criteria by using a prioritization system. 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 as having a notice to vacate, where a hearing has taken place and judgment to vacate has been issued, those that have received a court date notice or received notice of a utility disconnection or a 5-day demand letter.

### **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**

## **VII. 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.

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 or self-attestation in lieu of documentation. Recertification applications can be submitted no more than 30 days prior to funding expiring.

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 pandemic 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 be available to eligible applicants who are securing new housing in connection with the RentReliefRI program. Eligible applicants will receive up to one month's rent to be used for security deposit (in accordance with RI law) and may be approved at the same time for the equivalent of three months' forward-facing rent for the unit. In cases where an applicant is awarded this type of assistance, the security deposit, or any portion thereof, may be paid to the applicant as a form of additional assistance when the rental housing is vacated. In order to obtain a security deposit and up to three month's forward-facing rent, a prospective landlord/property manager must agree to execute a lease based on a preapproval letter submitted to applicant demonstrating that they have a unit available that they are willing to lease to applicant, pending applicant's ability to secure this assistance in the form of security deposit and three months of forward-facing rent from RentReliefRI. Applicant must secure unit within 90 days of receiving their preapproval notice. The lease from the landlord/property manager must include address of unit, date the lease agreement will begin, monthly rent rate and term of the lease.

- **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. A stipend for internet service will be available at a set rate of \$50/month, payable directly to the tenant, for up to 3 months forward facing to offset costs of current service or to initiate service. 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. If documentation of utility arrearage is not available for National Grid, RentReliefRI auditors can manually verify arrearage amounts with vendor and document that he/she accessed system and confirmed arrearage amounts and for which months.

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 arrearage to calculate allowable assistance per Treasury rules.

- **Other Expenses**

- a. Costs related to housing and that were incurred directly or indirectly due to COVID.
- b. Relocation Expenses-Includes relocation expense and rental fees (if a household has temporarily or permanently been displaced due to COVID)
- c. Accrued late fees as specified in lease agreement (if not included in rent arrearage). A max of \$150/month in late fees are eligible.
- d. RentReliefRI will cover the one-time cost 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.
- e. Hotel Fees
  - Applicants who are eligible for crisis and/or housing resources funded by ESG, FEMA, or other federal funding sources **are not eligible for assistance with a hotel stay through Rent Relief**. Crisis resources includes but is not limited to congregate and non-congregate shelter programs that may be available. Therefore, applicants are advised to utilize those resources if they are available to them through programs funded by ESG, FEMA, or other federal sources since they will not be eligible for Rent Relief.

- RentReliefRI will cover the cost of hotel stays for families that meet the eligibility requirements of the program, who have no other housing options, have already been in a hotel for a period of **30 continuous days in the same hotel** directly preceding the eligible stay, where payment from a source other than RentReliefRI has been used to cover the cost of the stay.
- If an applicant relocates to a different hotel, regardless of reason, they must meet the 30 continuous day stay in that different hotel. The cost for this 30 continuous day stay is not an eligible Rent Relief expense.
- The current period of homelessness must have commenced on or after April 1, 2020. **The applicant's Homeless Management Information System (HMIS) record may be reviewed as part of the eligibility process and the applicant authorizes the access of their HMIS record for this purpose.**
- If the hotel is being paid for by a non-profit or state agency, that entity will continue to pay hotel expenses, (act as the "landlord" in the RentReliefRI technology portal) and reimbursement will be provided to the agency when they provide invoices and proof of payment. **No reimbursement for previous months may be made directly to the applicant or an agency.**
- If an applicant is receiving services from a non-profit or state agency, the entity providing the service must act as the landlord and facilitate all necessary interactions between the applicant and the hotel.
- RentReliefRI is to be considered the vehicle for payment and is not responsible for coordinating services, mediating issues that may arise with the hotel, or placement at another location once the applicant leaves the hotel, regardless of reason.
- The cost of the hotel and reasonable fees necessary to keep an applicant housed will be considered eligible expenses.
- The amount of time spent in a hotel will count as time against the total number of months an applicant is allowed to receive assistance.
- The cost of the hotel will be recorded in the Yardi system as miscellaneous/hotel to facilitate reporting.
- Approval will be made for three months but paid out monthly.
- Applicant will, at the same time, be approved for security deposit and three months forward facing rent and provided with a pre-approval letter to facilitate finding a permanent residence.

All payments for housing related expenses must be supported by bill, invoice, or evidence of payment to provider of service.

## VIII. 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 calendar year 2020 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
- RIHousing may use discretion to determine income using HUD's definition or adjusted gross income as report on form 1040, based on what is most advantageous to the tenant.
- Applications submitted March 31, 2021, and prior will use 2020 HUD Income limits. Applications submitted April 1, 2021, will use 2021 HUD Income limits. Applications submitted April 18, 2022, or later will use 2022 HUD Income Limits.

If income documents are not available, income eligibility can be verified using HUD's Qualified Census Tract. If an applicant lives within a QCT, that will be noted by documenting that from the HUD site.

The following are included in the income determination along with a written attestation from the applicant:

- 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](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 confirm this fact on the self-attestation form.
- If a household is unable to provide any supporting documentation options to verify their income, they will be required to complete the income chart on the self-attestation form.



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](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. RI Housing 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.

## **IX. 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.

- If documentation is not available, the self certification lease document may be used, but must be signed by both tenant/landlord, only on cases that are being paid to the landlord will we accept the self-certification lease.
- Attestation by a landlord/property manager that is verified as the owner or management agent.
- 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.
- If applying for security deposit and forward-facing rent for a new rental, applicant will need to submit lease agreement showing effective date of lease.
- 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). Leases that are created, effective, or signed after the applicant experienced a hardship due to or during COVID are not eligible for assistance.

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)
- 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.
- 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 on or after 1/1/20.
- 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 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 written attestation. In these cases, income must be reassessed every three months. RIHousing may also rely on an attestation from a caseworker or other professional with knowledge of a household's circumstances. Waiver determination must be documented.

Qualifies for Unemployment:

- Unemployment Compensation Statement;
- Verification of unemployment eligibility received from RI Department of Labor and Training;
- Bank statements showing unemployment direct deposit.
- Any other verifiable records or information that establishes qualification for/receipt of unemployment.
- Unemployment must have begun March 13<sup>th</sup>, 2020 or later.

Demonstrates a risk of experiencing homelessness or housing instability:

- Past due utility or rent notice or eviction notice
- 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.
- A narrative will be required explaining this risk only if no documentation is available.
- Any other verifiable records or information that establishes this risk.

Reduction of income due to COVID:

- A narrative provided by the applicant; and
- A signed attestation (electronically signed is acceptable) and
- If the applicant is able, any verifiable supporting documentation to demonstrate a reduction in income incurred due to COVID

Experienced Financial Hardship Due to COVID:

- A narrative provided by the applicant; and
- A signed attestation (electronically signed is acceptable) and
- If the applicant is able, any verifiable supporting documentation to demonstrate a financial hardship experienced due to COVID

Incurred Significant Costs Due to COVID:

- A narrative provided by the applicant; and
- A signed attestation (electronically signed is acceptable) and
- If the applicant is able, any verifiable supporting documentation to demonstrate significant costs incurred due to COVID

Rental Arrearage

- Judgment to vacate
- 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  
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)

#### Attestation

- The tenant will attest that they have not received other rental or utility assistance for the same months and charges.
- Tenant will attest that all information included is correct and complete. Electronic signature is acceptable.

#### **2. 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.

#### **X. Program Integrity**

In the event that RIHousing relies on the self-attestation of an applicant, applicants 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. This includes The Work Number, Lexis Nexis, Melissa Data Address Verification and any other private or public databases available to RIHousing. At any time while assistance is provided, current information provided by the applicant through self-attestation will 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 (including a sampling of those processed by call center, 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

## **XI. Notification of Denial:**

An applicant will be denied participation in the Program if the applicant does not meet RentReliefRI specific criteria, including income eligibility and COVID Financial Hardship. 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.

## **XII. Reviews and Appeals**

RIHousing will offer an informal review to applicants for whom assistance is being denied due to program ineligibility. This process is not applicable to applicants denied due to no response. If following an informal review, the tenant wishes to have a hearing, they may make a request in writing and a hearing will be scheduled.

### **Notice to the Applicant:**

RIHousing must give an applicant prompt notice of a decision denying assistance. The notice contains the option for an applicant to appeal the decision and note on what grounds.

### **Scheduling an Informal Review**

A request for an appeal must be made via the "Appeal" button listed in the denial notice 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 email notice of the informal review within 10 business days of the applicant's request.

Case status listed as denied for the following reasons: Fraud, ineligible, and no response, have no means to appeal. Income denial is the only status that will be allowed to appeal.

### **Informal Review Decision**

RIHousing must notify the applicant of the final decision, including a brief statement of the reasons for the final decision. The notice will be e-mailed within 10 business days of the informal review. If the decision to deny is overturned as a result of the informal review, processing for assistance will resume and applicant will be notified using the email provided when the applicant created their portal account.

The applicant has 5 business days to provide missing information to complete the application. We will add a secondary status of document incomplete. If applicant does

not provide documentation requested the case will be Denied- no means of appeal. The applicant will need to reapply after this denial.

Nothing prevents the applicant from applying to the program again if their circumstances change and they believe that they meet the eligibility requirements.

### **Informal Hearing**

If after the informal review the applicant would like to pursue an informal hearing, they must make the request in writing to RIHousing by close of the business day, no later than 10 business days from the date of the notification of the decision of the informal review. RIHousing must schedule and send written notice of the informal hearing within 10 business days of the applicant's request. The applicant has the right to review and copy their application file and other pertinent documents held by RentReliefRI prior to the informal hearing. The applicant **must request, in writing, access to all documentation supporting the reasoning behind the denial, no later than twenty-four (24) hours prior to the hearing. Please email or mail to Jhavel Higgins a list of any documents that you intend to rely upon at the hearing no later than twenty-four (24) hours prior to the schedule start of the hearing.** The hearing may be scheduled in person or via teleconference and applicant will be provided with the hearing information. The applicant can be joined by representation if they choose to do so. A hearing officer will be present and after the hearing will produce a summary of the hearing complete with a decision statement that will be provided to the applicant.

### **XIII. 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 case will be denied.



#### **XIV. 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.