

CALIFORNIA COVID-19 RENT RELIEF STATE RENTAL ASSISTANCE PROGRAM

First Monthly Report to
Joint Legislative Budget Committee

California Department of Housing
and Community Development
June 4, 2021



**HOUSING
IS KEY**

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I. Executive Summary

The California Department of Housing and Community Development (HCD) is pleased to provide this report to the Joint Legislative Budget Committee (JLBC) on the progress of the California COVID-19 Rent Relief Program. This report provides information and updates about the state's rental assistance program and local jurisdictions that elected to receive a block grant pursuant to California Senate Bill No. 91 (SB 91) which was signed into law on January 29, 2021. This report covers the period beginning with program inception through May 31, 2021.

Establishment of the Program

Funding for this program is available to California from the United States Department of the Treasury (Treasury) under the federal Consolidated Appropriations Act, 2021 (the Act). In total, California received \$2.65 billion in federal Emergency Rental Assistance funds, both at the State level and allocated directly to jurisdictions with populations over 200,000. SB 91 created the State Rental Assistance Program and provided eligible jurisdictions with the option to join the State-managed program, accept their portion of the state allocation as a block grant, or run a local rent relief program concurrently with the state. The State-administered program supports 39 counties and two large cities, covering nearly 31% of the state's population. With HCD's support and guidance, 12 cities and 10 counties run their own local programs, and another nine counties and seven cities administer programs in cooperation with the state.

Immediately following the passage of the Act and SB 91, HCD moved rapidly to put staffing and resources in place to design and operate the multi-jurisdictional rental assistance program described in legislation. The initial start-up efforts included procurements of a fund distribution and case management contractor, marketing and outreach contracts, local partner networks, and technical support services to administer the state's program. These initial efforts also engaged community-based organizations to help connect landlords and renters to rent relief options, support applicants with completing applications, and solicit feedback from local levels to help improve the program's effectiveness.

In addition, HCD worked to develop program guidance for the block granted funds as well as establish operating agreements with jurisdictions running local programs to avoid duplicating benefits from the state-run program. As a result of those efforts, California was able to be among the first states to begin accepting applications for rental relief funds.

Preliminary Data

This report presents data for jurisdictions covered by the state-administered program which covers approximately 31% of Californians. Not included in this report are any statistics about those jurisdictions independently operating their own conforming programs because this data was not comprehensively yet available at the time of publication of this report. These jurisdictions, not accounted for in the statistics presented below, include approximately 41% of Californians in places such as the City of Los Angeles, City of San Diego, San Diego County, and Alameda County.

On March 15, 2021, HCD opened the state-administered program by launching an online portal to accept tenant and landlord applications for rent and utility assistance – providing access to 31% of Californians who live in jurisdictions covered by the state program. Jurisdictions running their own programs have a variety of start dates, but most are up and running as well.

For the state-administered program, HCD designed the portal and application to provide applicants with a low-barrier experience in multiple languages while still protecting the program's resources from fraud, abuse, and duplication. HCD and its fund distribution partner began processing applications for rental assistance as applications were received in March 2021, prioritizing applicants with the lowest-income levels, highest risks of eviction, and most COVID-19 impact. HCD's team issued the first rental assistance payments in early April.

Accounting for the 57 jurisdictions covered in whole or in part by the state-run program, the following data is current as of May 31, 2021:

- Over \$32 million of rental and utility assistance has been paid on behalf of more than 2,500 households.
- An additional \$116.7 million has been obligated, meaning payments are identified and committed pending additional information from the applicant and completion of final reviews.
- In total, more than \$490 million has been requested by applicants.

These statistics do not encompass jurisdictions administering their own funding under SB91-compliant programs. The statewide totals for funding awarded and administered is much higher than that presented above, but HCD is unable to provide a precise accounting until further data is received from local governments. This data is expected to be reported in the next monthly report.

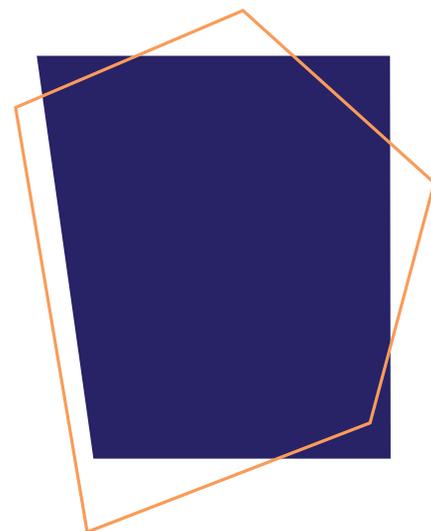
Next Steps

As the rental relief program rolled out nationwide, Treasury added a second tranche of almost \$2.6 billion to California's program, nearly doubling the resources available to California households and landlords, making this the largest rental assistance program in the nation. These expanded resources, combined with the fact that applications for rental assistance are being received at a slower pace than expected, affords the State an opportunity to do more to encourage more participation and to provide greater financial assistance to tenants and landlords in need.

Most importantly, the Governor announced as part of the May Revision a proposal to increase compensation to 100% for both rental arrears and prospective rent. In addition, the Governor proposed other program enhancements aimed at boosting participation, namely: ensuring tenants can access funds directly, providing more flexibility to pay future months of rent, and allowing tenants who no longer reside in units to pay their balances with this funding. These program additions will complement available housing stability services such as eviction and foreclosure counseling, tenant-landlord mediation, and legal aid.

In addition, HCD has made a variety of improvements to the application process: adding additional languages to the application, streamlining certain document requirements, and making other user-interface improvements. All of these changes have been spurred by engagement with stakeholders across a variety of interests and communities.

The Administration looks forward to engaging with the Legislature to effectuate some of the statutory changes detailed above, and HCD will continue to engage with stakeholders to bolster public awareness about this program, as well as to make any necessary improvements on a go-forward basis.



II. Continuously Adapting the Program to Evolving Needs



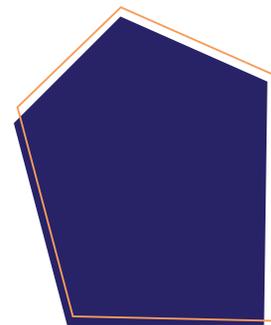
On May 10, Governor Newsom announced the Administration's plan to seek statutory changes to provide eligible applicants with 100% payment of rental debt and support for months of current and future rent, compensating tenants and landlords equally. We strongly support this proposal, as we believe such a change will spur greater use of the program, and particularly encourage small landlords and their tenants to apply for assistance.

HCD has also worked proactively to reduce and remove barriers to available rent and utility assistance. For example, an online mapping tool and eligibility quiz was added to the state's Housing Is Key website to route applicants directly to the correct assistance program for their location. HCD reduced the number of clicks necessary to get to the state's application, improved language accessibility within the application, and began using eviction risk indices mapping to inform the program's outreach, selection of partners, and neighborhood targeting.

HCD implemented a redesigned application portal in early June 2021 based on feedback and recommendations from user-centered design experts and stakeholders. The new application was reorganized and rewritten to improve understanding, accessibility, and ease in applying. The launch will include outreach to stakeholder groups, associations, and the public to promote and explain the changes. HCD will be monitoring user activity closely.

Given recent program flexibility provided by Treasury on May 7, 2021, HCD anticipates making further changes to ensure the program is accessible for applicants most in need. For example, HCD is updating its program policies to add flexibility for households in non-traditional rental agreements who may not otherwise qualify for assistance while maintaining an emphasis on building risk management and fraud prevention into the technology and case management processes. With solid controls in place and a better understanding of the information needed to process applications effectively, HCD is now able to refine the website's design to give users more flexibility within their applications without increasing waste, fraud, or abuse.

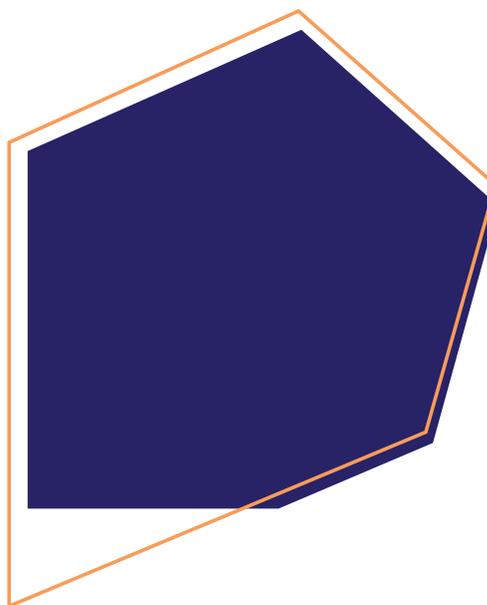
We believe that these ongoing improvements and, if enacted, the proposed statutory changes to the compensation levels will lead to higher levels of participation by California tenants and landlords. Now that the infrastructure, systems, and protocols are in place to ensure program rigor, HCD believes it is well positioned to continue administering the California COVID-19 Rent Relief Program as well as administer the Round 2 American Rescue Plan Act funding that will nearly double the financial assistance to eligible California households.



III. California's Statewide Rental Assistance Program Structure

HCD designed and implemented the State Rental Assistance program in compliance with federal and state legislation. SB 91 provides for three program administration options. Localities that did not receive a direct Emergency Rental Assistance Program (ERAP) distribution from Treasury (i.e., those with populations under 200,000) are automatically served through HCD's California COVID-19 Rent Relief Program. SB 91 gave Large Jurisdictions who had received a direct federal allocation from Treasury three options to choose from in implementing their direct federal allocation and proportionate share of the state's federal allocation. Those implementation options are outlined below.

- Option A – State-Administered Program: SB 91 set up the California COVID-19 Rent Relief Program to serve jurisdictions with populations under 200,000 and Large Jurisdictions that chose to opt-in. Large Jurisdictions that opt into HCD's California COVID-19 Rent Relief Program have their direct allocation from Treasury administered by HCD through one central application process.
- Option B – Locally Administered Programs: SB 91 also gave Large Jurisdictions, those with populations over 200,000 and that received a direct ERAP allocation from Treasury, the option to receive their share of the state's direct allocation as a block grant. Eligible jurisdictions that administer local programs with state block grant funds agree to distribute both their federal and state ERAP allocations in accordance with the provisions of SB 91.
- Option C – Dual Implementation: Finally, SB 91 provided jurisdictions with populations over 200,000 that had received a direct ERAP allocation from Treasury the option to distribute their federal ERAP allocation under the federal Consolidated Appropriations Act provisions and applicable local requirements. California's COVID-19 Rent Relief Program administers the jurisdictions' share of state ERAP allocations under the requirements of SB 91. As of May 31, 2021, all 16 Option C jurisdictions had opened their respective local programs and began accepting applications for assistance utilizing direct federal allocations. Five of the programs were no longer accepting applications at the end of May based on the volume of applications received so far. Those jurisdictions currently redirect new inquiries to the state-administered program to apply. Refer to Appendix V on page 33 for a list of Option C jurisdictions, their status, and bifurcation approaches.



IV. Program Performance

a. Obligation and Expenditure by Area Median Income Level

The tables below depict the level of funds obligated in total and those expended to aid applicants with household incomes in three categories of Area Median Income (AMI). In reviewing submitted applications, HCD initially “obligates” funds to commit them to an Eligible Household or Eligible Landlord pending the receipt of additional information, completion of quality reviews, and final application approval. Those obligated funds are listed as “expended” following issuance of approved payments. Results reflect state-administered operations for small jurisdictions, those jurisdictions electing Option A, and HCD’s management of specified application types for jurisdictions in Option C. In accordance with state and federal legislation, applications for rental and utilities arrears are prioritized before those seeking assistance with current and prospective rent and utilities. HCD expects to begin obligating funds for prospective payments in coming months. Data reported by Option B jurisdictions is incomplete as most of the locally administered programs have not yet completed their program designs and received their state block grant allocations.

Reporting through May 31, 2021.

State-Administered Program - Option A Jurisdictions

	Rent	Utilities	Total
Funds obligated for arrears	\$ 124,407,021.00	\$ 1,751,927.58	\$ 126,158,948.58
Funds expended for arrears by income level	\$ 30,857,790.41	\$ 0	\$ 30,857,790.41
<=30% AMI	\$ 17,792,306.41	\$ 0	\$ 17,792,306.41
>30 and <=50% AMI	\$ 8,891,397.00	\$ 0	\$ 8,891,397.00
>50 and <=80% AMI	\$ 4,174,087.00	\$ 0	\$ 4,174,087.00
Funds obligated for current and prospective payments	\$ 0	\$ 0	\$ 0
Funds expended for current and prospective payments by income level	\$ 0	\$ 0	\$ 0
<=30% AMI	-	-	-
>30 and <=50% AMI	-	-	-
>50 and <=80% AMI	-	-	-

Locally Administered Programs - Option B Jurisdictions

Option B jurisdictions include 12 cities and 10 counties, comprising approximately 41% of California's population, and approximately 39% of the federal- and state-allocated ERAP funds. HCD continues to work with Option B jurisdictions to standardize consolidated reporting similar to the results portrayed for state-administered program funds. HCD expects to include this data in the next monthly report.

State-Administered Portion - Option C Jurisdictions

Values reflect HCD's use of federal funds administered by the state on behalf of the jurisdictions in accordance with documented agreements for bifurcating applications received.

	Rent	Utilities	Total
Funds obligated for arrears	\$ 22,322,696.00	\$ 473,305.02	\$ 22,796,001.02
Funds expended for arrears by income level	\$ 1,329,115.00	\$ 0	\$ 1,329,115.00
<=30% AMI	\$ 644,170.00	\$ 0	\$ 644,170.00
>30 and <=50% AMI	\$ 361,775.00	\$ 0	\$ 361,775.00
>50 and <=80% AMI	\$ 323,170.00	\$ 0	\$ 323,170.00
Funds obligated for current and prospective payments	\$ 0	\$ 0	\$ 0
Funds expended for current and prospective payments by income level	\$ 0	\$ 0	\$ 0
<=30% AMI	-	-	-
>30 and <=50% AMI	-	-	-
>50 and <=80% AMI	-	-	-

b. Obligation and Expenditure by Race and Ethnicity

Results reflect state-administered operations for small jurisdictions, those jurisdictions electing Option A, and HCD’s management of specified application types for jurisdictions in Option C. Reporting through May 31, 2021.

The tables and charts below depict tenant and landlord applications for assistance at principal stages of processing:

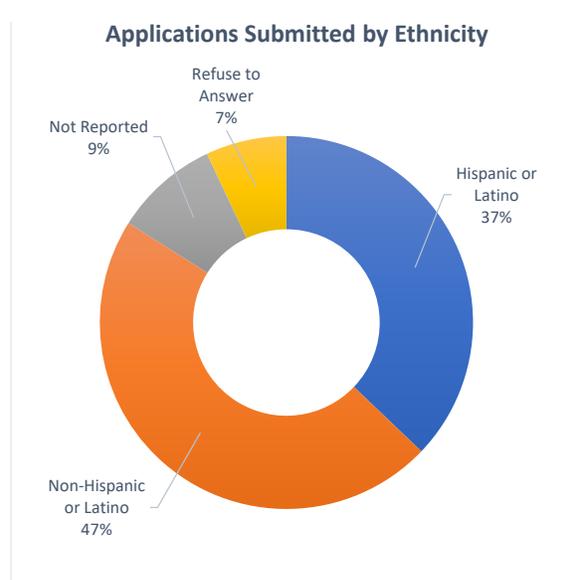
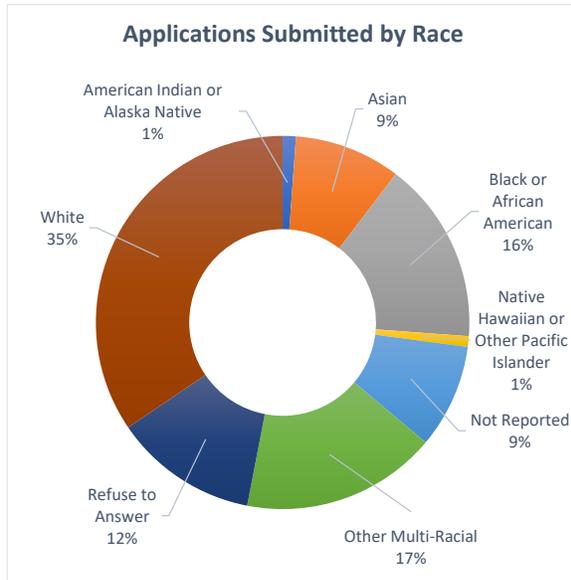
- Application Submitted – Tenant (with or without landlord participation) has completed their application, submitted it, and it is ready for Case Manager review.
- Funding Obligated – Funds have been identified and committed to an eligible tenant or eligible landlord pending final application approval.
- Approved (Pending Payment) – Quality Assurance / Quality Control (QA/QC) has reviewed an application and approves it for payment. Finance team takes over and begins payment process.
- Paid – Application meets the program requirements, has been fully reviewed, and is in final process for payment. This total also includes all payments issued within the jurisdiction to date.

1. Applications¹ Submitted by Race and Ethnicity

Race	Submitted Applications
American Indian or Alaska Native	507
Asian	4,092
Black or African American	7,017
Native Hawaiian or Other Pacific Islander	407
Not Reported	4,001
Other Multi-Racial	7,519
Refuse to Answer	5,523
White	15,316
Grand Total	44,382

Ethnicity	Submitted Applications
Hispanic or Latino	16,481
Non-Hispanic or Latino	20,775
Not Reported	4,021
Refuse to Answer	3,105
Grand Total	44,382

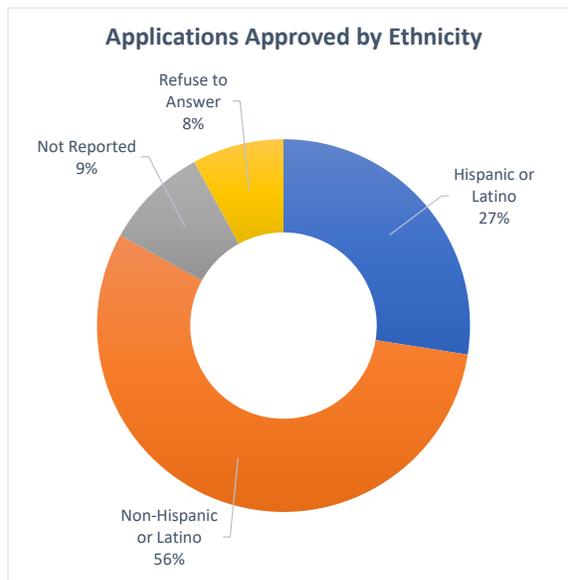
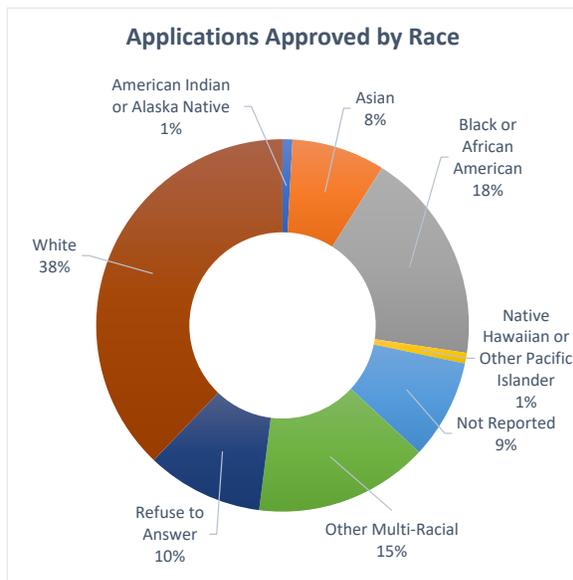
¹ Application count includes all “submitted” applications received by the state-administered program. Some of these applications may prove to be ineligible, duplicate, or in need of redirection to other jurisdictions’ programs.



2. Applications Approved by Race and Ethnicity

Race	Approved Applications
American Indian or Alaska Native	27
Asian	256
Black or African American	582
Native Hawaiian or Other Pacific Islander	29
Not Reported	273
Other Multi-Racial	477
Refuse to Answer	320
White	1,197
Grand Total	3,161

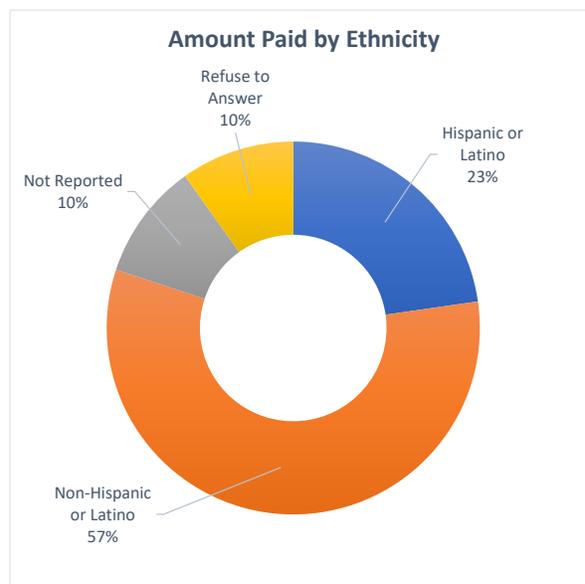
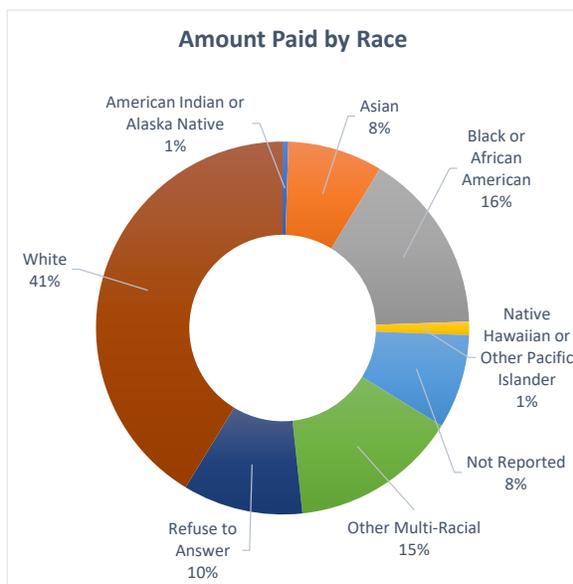
Ethnicity	Approved Applications
Hispanic or Latino	869
Non-Hispanic or Latino	1,756
Not Reported	285
Refuse to Answer	251
Grand Total	3,161



3. Amount Paid by Race and Ethnicity

Race	Expended Amount
American Indian or Alaska Native	\$ 159,929.31
Asian	\$ 2,649,266.10
Black or African American	\$ 5,060,180.54
Native Hawaiian or Other Pacific Islander	\$ 374,304.66
Not Reported	\$ 2,630,369.77
Other Multi-Racial	\$ 4,674,102.69
Refuse to Answer	\$ 3,345,592.20
White	\$ 13,293,160.14
Grand Total	\$ 32,186,905.41

Ethnicity	Expended Amount
Hispanic or Latino	\$ 7,313,790.87
Non-Hispanic or Latino	\$ 18,456,737.56
Not Reported	\$ 3,249,122.92
Refuse to Answer	\$ 3,167,254.06
Grand Total	\$ 32,186,905.41



V. Background

a. Consolidated Appropriations Act, 2021 and the Federal Rental Assistance Program

The federal government passed the federal Consolidated Appropriations Act of 2021 (the "Act") into law on December 21, 2020. The Act allocated approximately \$25 billion nationwide for the Emergency Rental Assistance Program ("ERAP"). The ERAP seeks to help stabilize tenants and landlords impacted by the COVID-19 pandemic and associated economic fallout. States were awarded ERAP funding in proportion to their share of the total US population according to the 2019 Census. The State of California received approximately \$2.65 billion in rental assistance support. Around \$1.4 billion was given directly to the state, while the remaining balance was provided directly to local jurisdictions with populations above 200,000.

1. Eligible ERAP Activities

Pursuant to Section 501(c) of Subtitle A of Title V of Division N of the federal Consolidated Appropriations Act, 2021, rental assistance funds can only fund rental arrears, future rental payments, utility and home energy cost arrears, future utility and home energy costs, and "other expenses related to housing incurred due, directly or indirectly, to the novel coronavirus disease (COVID-19) outbreak" as determined by

the Secretary of the United States Department of the Treasury. The Act requires implementers to prioritize the payment of existing housing-related arrears that could result in the eviction of an eligible household. Further, the Act provides that implementers should reduce an eligible household's rental arrears before providing them support for current and future rent. The Act also allowed for a small portion of ERAP funds to go to program administration, outreach, and housing stabilization services.

2. Eligible Recipients and Prioritization of ERAP Funds

Under the Act, at least one member of a renter household must meet at least one of the following criteria to receive rent and utility relief assistance:

- Qualifies for unemployment or has experienced a reduction in household income, incurred high costs, or experienced a financial hardship due to COVID-19; or
- Demonstrates a risk of experiencing homelessness or housing instability.

In addition to meeting one of the requirements above, the household must be at or below 80 percent AMI.

Within these criteria, the Act requires implementers to prioritize rental assistance funds for households with incomes under 50 percent of AMI and/or who have one or more household members who have been recently unemployed. The primary rationale for this focus is to stabilize households impacted by the COVID-19 pandemic.

3. Non-discrimination

It is a state priority that all persons eligible for these funds receive equitable access to assistance and are served with dignity, respect, and compassion regardless of their circumstance, ability, or identity. Eligible person's circumstance, ability, and identity include but are not limited to their belonging to a marginalized ethnic or racial community, immigration status, criminal record, disability, gender or sexual identity, and belonging to a group that has traditionally been unable to access mainstream support. HCD recognizes that those most in need of pandemic-related rental assistance are often also those for whom barriers to accessing such a program are the highest. With this in mind, HCD's guidelines seek to ensure those most in need of assistance are prioritized in and served by the State Rental Assistance Program and block grant programs.

4. Obligation and Expenditure Deadlines

Under the Act, by September 30, 2021, Large Jurisdictions must have obligated at least 65 percent of their direct federal allocation. If Large Jurisdictions fail to obligate at least 65 percent of their direct federal allocation by September 30, 2021, they risk having these funds recaptured and reallocated by Treasury. The Act also requires the complete expenditure of ERAP funds by December 31, 2021 (subsequently extended to September 30, 2022, pursuant to federal law).

SB 91 also established deadlines for funding obligation and expenditure of state allocations. Jurisdictions that opted to receive state block grants must commit to obligating their state funds by June 1, 2021, and fully expend all funds by August 1, 2021. Similar to the terms contained in the federal Act,

SB 91 allows for HCD to recapture under-utilized allocations and reallocate them to other jurisdictions with demonstrated need and capability to distribute funds to eligible households. SB 91 also allows for HCD to waive recapturing of a local jurisdiction's funds if the jurisdiction can demonstrate it has a reasonable plan to meet Treasury deadlines. The objective of this clause is to ensure that California is best positioned to avoid having critical federal resources recaptured by Treasury.

5. Fraud Prevention and Duplication of Benefits

The Act also requires fund implementers to design and implement program features that prevent the duplication of benefits (DOB). This stipulation requires HCD and its local jurisdictional partners to work to prevent households from receiving payments from multiple sources for the same incurred expenses, either unintentionally or fraudulently.



b. SB 91 and the State Rental Assistance Program

To implement state funds made available from the Act and provide support for California's most vulnerable renters impacted by COVID-19, California passed SB 91. SB 91 created the state Rental Assistance Program and provided eligible jurisdictions with the option to accept their portion of the state allocation as a block grant. SB 91 also gave HCD the authority to create guidelines regarding the administration of the federal rental assistance funds consistent with the requirements of the federal law and any regulations or guidance promulgated pursuant to federal law.

SB 91 also extended tenant protections included in the Tenant, Homeowner, and Small Landlord Relief and Stabilization Act of 2020 (AB 3088) to June 30, 2021. Specifically, SB 91 prevents evictions for nonpayment of rent by tenants experiencing a COVID-19 hardship and who pay at least 25 percent of their rent owed between September 2020 and June 2021. Key components of the SB 91 State Rental Assistance Program include:

1. Compensation parameters for rental arrears, both for landlord participation and non-participation

For assistance provided through the participating landlord process, as defined in Health and Safety Code Section 50897.1(d), compensation was set at exactly 80 percent of an eligible household's unpaid rental debt from April 1, 2020, to March 31, 2021. To receive payment, the landlord must agree to forgive the household's remaining outstanding rental debt per that subdivision.

For assistance provided through the non-participatory landlord process under Health and Safety Code Section 50897.1(e), compensation was set at 25 percent of an eligible household's unpaid rental debt from April 1, 2020 to March 31, 2021. For this process, households would receive the 25 percent directly.

2. At least three rounds of fund administration, with round prioritization as follows:

(1) Round one prioritizes eligible households, as specified in Section 501(c)(4) of Subtitle A of Title V of Division N of the federal Consolidated Appropriations Act, 2021 (Public Law 116-260), households with income that is less than 50 percent AMI.

(2) Round two priority shall be given to communities disproportionately impacted by COVID-19, as determined by HCD.

(3) Round three prioritizes eligible households with a household income less than 80 percent of AMI and who did not get prioritized in rounds one and two.

Households with income less than 50 percent of AMI continue to receive prioritization in the second and third rounds in line with the State Rental Assistance Program requirements.

3. California Department of Housing and Community Development program administration and contracting authority

SB 91 also authorized HCD to administer the program in accordance with applicable state and federal law. The bill further authorized HCD to contract with a vendor to serve as the program implementer to manage and fund services and distribute emergency rental assistance resources.

4. Program Implementation Options

Localities with populations under 200,000 are automatically served through HCD's California COVID-19 Rent Relief Program. SB 91 gave Large Jurisdictions three options to choose from in implementing their direct federal allocation and proportionate share of the state's federal allocation. Those implementation options, described previously on page 3, are listed below.

- Option A – State-Administered Program
- Option B – Locally Administered Programs
- Option C – Dual Implementation

5. Fund Expenditure Timeframes

As per the requirements of SB 91, Option B jurisdictions are required to obligate at least 65 percent of their block grant funds by June 1, 2021. Jurisdictions that do not obligate 65 percent of their total emergency rental assistance funds may have their block grant funds recaptured by HCD. Jurisdictions that demonstrate they have a plan to implement their funds within the federal timeframes can have this state timeline waived through consultation with HCD.

VI. Planning and Design

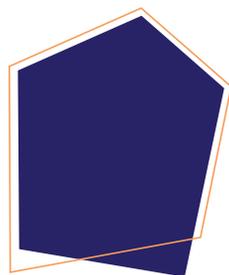
a. HCD's Direct Rental Assistance Program known as "California COVID-19 Rent Relief"

HCD contracted with a program implementer to manage the distribution of rental assistance directly to eligible households and landlords for Small Jurisdictions as well as for Large Jurisdictions that opted to participate in the statewide direct assistance program ("Option A"). The program implementer provides, on behalf of HCD, a mobile-friendly online application process, application review and data validation, applicant verification, fraud safeguards, multi-language access, de-duplication checks, ADA accessibility, and direct deposit support for both landlord and tenant applicants.

HCD engaged rapidly with all Large Jurisdictions that elected to have their direct federal allocations administered through the state program to ensure their communities were fully included in the launch of the state's program. HCD worked with these Option A jurisdictions to execute Standard Agreements and arrange for the localities' federal allocations to be redirected to the state. HCD manages the redirected federal funds along with each jurisdiction's proportionate share of state funds to serve applicants within the respective jurisdiction's boundaries.

HCD also engaged a vendor to facilitate partnerships with non-profit service providers and local agencies to provide outreach to applicants without access to technology, applicants with language access challenges, and applicants that need support in completing the application process.

In February, HCD also created an advisory committee made of staff from all Large and Small Option A localities. In the planning and design phase, the advisory committee provided feedback on the program's implementation strategies.



b. Planning and Design of the Coordinated Programs Among Option B Jurisdictions

Per the requirements of SB 91, jurisdictions of sufficient size and readiness could elect to receive their share of the state's direct allocation as a block grant by formally making a request to HCD not later than February 12, 2021. In making such a request, each jurisdiction agreed to utilize its direct federal allocation in a manner consistent with the requirements of SB 91. Consistency was deemed necessary to ensure equitable and efficient distribution of local assistance across jurisdiction boundaries. HCD has continued working closely with each of the 22 Option B jurisdictions that requested state block grant allocations to provide them guidance and help verify that their respective rental assistance programs conform to applicable state and federal guidance.

As HCD worked with the Option B jurisdictions, the team spent a substantial amount of time helping to ensure the locally administered programs would be consistent among jurisdictions and in conformance with SB 91. These efforts focused on three key aspects of program delivery: applicant eligibility, eligible use of funds, and compensation standards. HCD believes SB 91 and federal statute are quite clear that all applicants must be treated fairly and equitably, regardless of the avenue available to them for requesting rental assistance.

HCD and the jurisdictions' teams have been working to ensure they do not administer rental assistance in a way that is inequitable in the administration of direct rental assistance by the state or any of the local programs. Additionally, jurisdictions that run local programs using state block grant allocations must not add requirements to their programs that deter or prevent access. These requirements include but are not limited to those that intentionally or unintentionally result in discrimination against protected classes, requirements relative to legal resident status, and requirements that condition access on driver's licenses, formal leases, or citizenship documentation.

c. HCD's California COVID-19 Rent Relief Program and Option B Jurisdiction Documentation Requirements

During the program's design phase, stakeholders, program staff, and others highlighted that robust documentation requirements often bar those most in need of assistance from applying to programs like the ERAP. Accordingly, HCD has sought to keep documentation requirements for HCD's California COVID-19 Rent Relief Program and the coordinated Option B programs as simple as possible while balancing the need to capture potential duplication of benefits and address fraud risks. Examples of accepted simple documentation include current participation in income-driven programs like Medicaid, a 2020 tax return, unemployment statements, or self-attestations. Similar document types are available for tenant households to provide to show loss of income or unemployment and current residency.

d. Dual Implementation Approach Among Option C Jurisdictions

Pursuant to SB 91, a locality that was eligible for, but did not receive, state block grant funds could elect to administer its own direct federal share of assistance without conforming to the state's guidance. In such cases, HCD retains the jurisdiction's proportionate share of state funds to be administered by HCD on behalf of applicants not served by the local program. HCD has worked with each of the 16 such Option C jurisdictions to delineate clear bifurcations between local and state programs. Methods for splitting responsibilities include identifying specific transition dates and/or household income levels the local programs will serve. Appendix V on page 33 provides a summary table of the bifurcation between local and state programs.

When HCD and a local jurisdiction run programs at the same time serving the same geographic area, the risk increases that both programs may receive applications for the same household. To mitigate this concern, HCD has endeavored to arrange data-sharing agreements with each Option C jurisdiction for the purpose of preventing unlawful duplication of assistance to eligible households.

e. HCD's California COVID-19 Rent Relief Program Project Team

HCD recognized that it needed to pull together an inclusive team of vendors and staff to rapidly provide the services and support described in federal and state legislation. HCD strategically selected vendors for their experience working with similar programs and serving hard-to-reach, low-income, and with culturally diverse clients. HCD redirected staff and managers to lead the State Rental Assistance Program and conducted rapid procurements to engage contractors experienced in case management, application processing, fund distribution, marketing and outreach, and local partner network development. All the vendors were under contract within 60 days of the passage of SB 91. HCD continues to assess staff and contractor needs to operate and support partners and applicants statewide.

f. Program Administration

1. Online Application Portal

The online application portal was designed to offer a path to help for the many Californians with unexpected rent- and utility-related financial hardships created by COVID-19. The portal was designed to help both tenants and landlords navigate the application process.

2. Case Management

Early on, HCD recognized that applicants would need a personalized point of contact to assist them in navigating the application process. Recognizing this, HCD opted to hire a case management team. HCD designed the case management team to offer proactive, culturally sensitive, one-on-one assistance to applicants as they navigate the application process.

3. Call Center

HCD designed and prepared the Call Center to communicate with applicants from diverse backgrounds and who could be calling while experiencing very challenging personal issues. HCD set up the Call Center to be accessible through the toll-free number 833-430-2122 seven days a week from 7 am to 7 pm Pacific Time during the application period, except for state and federal holidays. HCD selected these hours of

activity because they accommodate the broadest assortment of applicants' schedules. In preparing the Call Center, HCD also made sure the center could support applicants in California's main languages and with comprehensive support for additional languages.

4. Program Integrity and Duplication of Benefits

At the start of the pandemic, numerous localities provided rental assistance to tenants at risk. Further, a program of this size and scope is at high risk for fraud and abuse. SB 91 requires fraud detection and prevention measures for all stand-alone rental assistance programs. Given these considerations, HCD designed the program and its processes to balance fraud prevention and program accessibility. Overall, HCD's program paid significant attention to design, vendor selection, and operating procedures to balance stewardship of public money with an application that is accessible to the target population.



g. HCD's California COVID-19 Rent Relief Program Education and Outreach

1. Association Briefings, Trainings & Listening Sessions

Between January and May 2021, HCD met with a range of stakeholder organizations to educate them and enlist them in outreach efforts. These training sessions, conversations, and listening sessions provided invaluable insights that helped to refine and advance the California COVID-19 Rent Relief Program education and outreach strategy.

Below is a representative sample of organizations with whom HCD hosted webinars and briefing sessions:

- League of California Cities
- California State Association of Counties
- California tenant coalition groups
- California landlord coalition groups
- California tribes and tribally designated housing entities
- Los Angeles County Business Federation
- Housing is Key listserv organizations

2. Traditional Media and Social Media Outreach

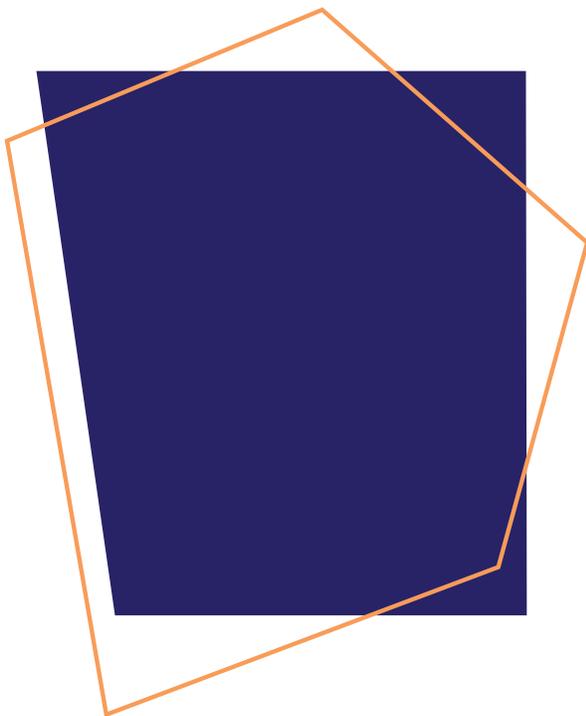
SB 91 required HCD to launch the application portal for the California COVID-19 Rent Relief Program application by March 15, 2021. SB 91 also prioritized ERAP funds for very-low-income households and those hardest hit by COVID, traditionally the hardest-to-reach populations. With this in mind, HCD and its education and outreach partners worked diligently through January, February, and March to lay the groundwork for a targeted but flexible education and outreach campaign that could reach and resonate with those most in need and the landlords who serve them.

3. Establishment of Community-Based Partner Network

As stated previously, households most impacted by COVID-19, most at risk of housing instability related to COVID-19, and under 50 percent AMI are typically more challenging to reach than other populations and face additional barriers applying to programs like the ERAP. HCD intentionally and systematically built relationships with community-based partners across the state to provide person-centered and

culturally relevant guidance to Californians most in need of rent arrears assistance. A list and map illustrating the Local Partner Network (LPN) coverage are provided in Appendix VII starting on page 37.

Recognizing that landlords are also in need of assistance with rent arrears and that landlord participation is vital to clearing households' rental debt, HCD also established partnerships with landlord organizations across the state.



h. Utilities

HCD has actively coordinated with the California Public Utilities Commission (CPUC). In response to HCD's need to verify utility balances, on April 15, 2021, the CPUC directed 10 large utility providers in the state to provide customer data validation to facilitate HCD's administration of the program (see Appendix VIII on page 40 for a copy of the CPUC directive). HCD has coordinated with these 10 entities and other utility providers in the state to receive data addressing utility costs eligible for payment. Several larger utility companies are individually implementing campaigns to promote the program. So far, these campaigns have utilized social media, bill stuffers, and call communications. Currently, HCD is able to verify over 90 percent of electric and gas claims. For other types of utilities, HCD can now validate 70 percent of claims.

Utility providers coordinate with HCD's vendor to verify reported utility costs on applications and to verify the claimed unpaid balances are in alignment with amounts on record. When data is not available from utility providers, HCD shall accept documentation from applicants (e.g., most recent statement). Utility expenses eligible for payment include water, gas, electricity, trash, sewer, fuel oil, and internet access. The data from utility providers and documentation provided by applicants provides the necessary support to validate amounts owed and to then provide payments on arrears amounts and prospective balances, as appropriate. Utility providers are not allowed to initiate an application on a tenant's behalf. As with the application for rental assistance, HCD uses the data provided on the application to determine if the applicant meets the income eligibility threshold (i.e., below 80 percent AMI) and where the application stands in terms of prioritization (e.g., below 50 percent AMI). When utilities are included in the total contract rent price, the SB 91 calculations for rental arrears applies. If utilities are included in the 80 percent compensation limit under SB 91, landlords may not apply for additional assistance for utility arrears separate and in addition to rental arrears.

VII. Implementation and ongoing efforts as of May 31, 2021

a. Team Assembly and Milestones

Since the enactment of SB 91 on January 29, 2021, HCD prioritized the implementation of the California COVID-19 Rent Relief Program. This effort, which represents a collaboration with the Business, Consumer Services and Housing Agency (BCSH), included assembling a team of HCD staff, hiring additional non-state staff on an interim basis, and the procurement of vendors to successfully implement the program.

Through May 31, 2021, accomplishments are demonstrated by the following:

- Assigned 18 staff at HCD and BCSH Agency to lead and manage the program
- Hired 19 non-state staff on an interim basis (includes several retired annuitants and other skilled personnel) to implement the program
- Procured the services of three key vendors

Other significant milestones through May 31, 2021, include the following:

- SB 91 signed by the Governor on January 29, 2021
- Funding received from Treasury on February 3, 2021
- Communications vendor (Prosio) hired on February 10, 2021
- Local Partner Network vendor (LISC) hired on February 10, 2021, to cultivate and maintain network of community-based partners
- February 12, 2021, local jurisdictions designated participation as Option A, Option B, or Option C
- Fund Distribution Partner (FDP) vendor (Horne) hired on March 4, 2021, to provide the technology and staffing solution that offers the application portal, Call Center, case management, quality control/quality assurance, and funds disbursement

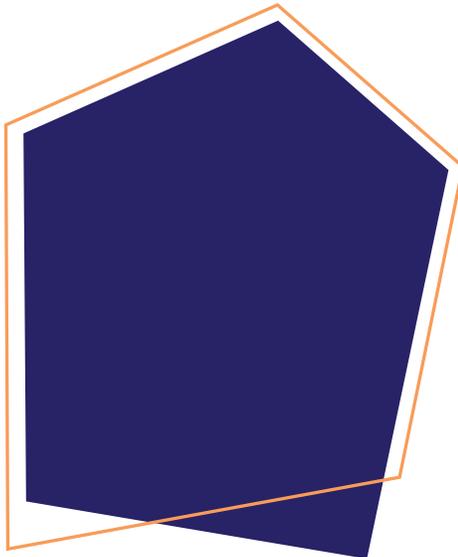
- Call Center initiated a soft opening on March 11, 2021, in advance of the opening of the application portal
- State portal opened on March 15, 2021 to accept applications from tenants and landlords
- April 12, 2021, LISC launched an appointment scheduling platform to allow LPN organizations to schedule and monitor appointments with applicants requesting assistance.
- As of May 31, 2021 for the Call Center:
 - Over 221,500 calls to the Call Center since opening
 - Average wait time of approximately four seconds
 - Languages utilized include Cantonese, English, Armenian, Korean, Mandarin, Spanish, Tagalog, and Vietnamese. Additional language support is available for more than 200 languages through on-call translation services
- As of May 31, 2021 Program Metrics:
 - Over 44,380 applications submitted (not including duplicates and redirections)
 - More than 40,870 tenant applications and over 3,500 landlord applications
 - Obligated more than \$148 million for rental and utilities arrears for eligible applicants

b. HCD's California COVID-19 Rent Relief Program and Option A Jurisdictions

On March 15, 2021, HCD and its Program Implementer successfully launched the California COVID-19 Rent Relief Program and began accepting tenant and landlord applications. The program was publicly available and operational by the deadline established in SB 91.

During approximately the first 75 days of operations (i.e., March 15 through May 31, 2021), the California COVID-19 Rent Relief Program received approximately 44,380 submitted applications (after removing duplicates and redirecting applicants served by local programs). The state program is designed for applicants to submit their full application upfront versus an expression of interest for participation that is trailed by case management to complete the application. The Program Implementer and HCD established application screening protocols to help confirm the submitted applications represented households within the jurisdictions covered by the state-operated program. Applicants found to reside in jurisdictions covered by locally administered programs are redirected to the appropriate program. This early process step redirected approximately 1,200 applications to the proper Option B jurisdictions and more than 4,400 applicants to their respective Option C program.

HCD prioritized applications from jurisdictions covered by the state-operated program for case management review and further processing based on income level, date received, and household criteria. As of May 31, case managers had performed at least a preliminary examination of the applications submitted from jurisdictions covered by the state-run program and prioritized them for payment per tenant vulnerability factors. Case managers followed up with applicants to verify or seek information and proactively reached out to landlords to encourage their participation in active applications. At the end of May, roughly 50 percent of the applications received in the state-run program were in active stages of review and approval.



c. Coordinated Programs Among Option B Jurisdictions

Jurisdictions that requested state block grant allocations to support their locally administered programs agreed to operate in conformance with SB 91 requirements. To demonstrate their local operations would comply with applicable state and federal guidance, HCD required each jurisdiction to submit documented Program Guidelines and Workplans before approving block grant funds. HCD provided Option B jurisdictions with written guidance, templates, examples, and frequent meetings to support their development of Program Guidelines that conformed to SB 91. Although some jurisdictions began accepting applications in mid-March, many are refining their operating guidelines to comply with the state's program parameters.

HCD has engaged with all 22 of the Option B jurisdictions to understand their program plans and parameters prior to and during their respective launches. In addition, HCD requested activity and financial data from each jurisdiction as soon as it becomes available. Figure 1 illustrates five large Option B jurisdictions that reported point-in-time estimates of the demand for assistance in their communities. Data is subject to change based on actual applications, eligibility reviews, and funds available for disbursement.

Figure 1. Emergency Rental Assistance Applications Received in Selected Option B Jurisdictions

	Jurisdiction A	Jurisdiction B	Jurisdiction C	Jurisdiction D	Jurisdiction E
Tenant-initiated Applications received	11,232	12,903	3,520	67,065	11,649
Landlord-initiated Applications received	998	1,915	1,202	43,426	2,006
Cumulative dollar value of requests for Rent Arrears to-date:	\$55,262,993	\$45,500,000	\$30,000,000	\$513,837,138	\$41,384,913
Cumulative dollar value of requests for Prospective Rent payments to-date:	\$50,694,420	\$58,600,000	\$17,610,000	\$660,689,928	\$12,330,590

HCD will continue to monitor and track progress throughout the jurisdictions as part of HCD's role to ensure adequate state and federal funds are allocated where needed.

d. Dual Implementation Approach Among Option C Jurisdictions

Sixteen jurisdictions chose to establish local programs that followed federal rental assistance requirements but do not conform to SB 91 (i.e., Option C). Because they did not commit to meeting SB 91 requirements, these jurisdictions did not receive HCD's approval or review of their respective program parameters. Similarly, HCD does not actively oversee jurisdictions' operations or financial management practices that utilize only the direct federal allocation of emergency rental assistance funds. Since the program's inception, HCD has worked with all the Option C jurisdictions to support standard statewide practices, direct applicants to the appropriate resources, and mitigate the risk of providing duplicate or excess benefits.

Some of the Option C jurisdictions established rental assistance programs during the first quarter of 2021 or adapted existing programs to expand the emergency rental and utility assistance available. Although it is not responsible for the independently administered programs, HCD recognized that some of the localities had not opened their application processes as of late May. HCD retained applications submitted for households within Option C jurisdictions that did not yet have active application processing capabilities to help prevent households in need from being overlooked or lost between programs.

e. Program Administration

1. Online Portal

As stated previously, HCD designed the online portal to provide a “no wrong door approach” to tenants and landlords across the state. Pivotal to this implementation, applicants must complete an eligibility questionnaire before proceeding to begin an application with the California COVID-19 Rent Relief Program. This questionnaire seeks to ensure applicants apply to the correct program and, depending on applicant responses, helps redirect applicants to their local programs. Questions include:

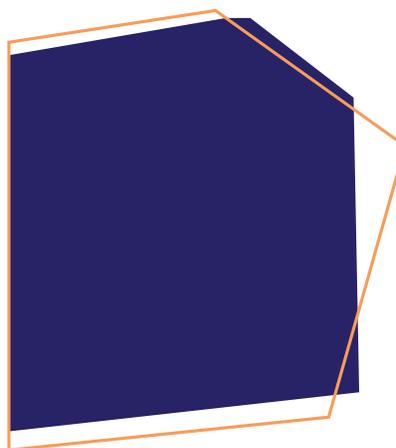
- Is the residence located in California?
- Asks the income level of the household (i.e., lower than 80 percent AMI).
- Is a member of the household at risk of housing instability?
- Has a member of the household experienced financial impacts related to COVID-19?
- Location of the residence in California (i.e., jurisdiction) to address the risk of overlapping with jurisdictions operating a local program.
- Tribal members are encouraged to apply through their tribal programs.

For tenants and landlords eligible to apply through HCD’s California COVID-19 Rent Relief Program, the online application portal collects the required information from the applicants (both tenants and landlords). Before submitting an application, landlord and tenant applicants must attest to the following:

- All information provided is true, accurate, and complete.
- That falsification of information or any material falsehoods or omissions in the application, including knowingly seeking duplicative benefits, is subject to state and federal criminal penalties.
- Landlords certify that payment under the program represents payment in full for the rental debt owed by the tenant for the specified time period.

The location of the online portal is available via the “Housing is Key” website.

Since the rapid design and launch of the online portal, HCD has worked continuously to make the website and application as accessible as possible for applicants. For example, HCD updates the eligibility quiz regularly to route applicants to the correct application portal as local programs open and close. In addition, HCD made several updates to the eligibility quiz language in response to stakeholder feedback. These changes have streamlined the application process for applicants across the state. However, HCD recognizes that further revisions to the website and online application are needed to help ensure the program is easily accessible for applicants most in need of relief.



HCD has been working with stakeholder groups, user experience designers, legal consultants, and its Local Partner Network to improve the application, website, and program. In addition, HCD used analytics about online user behaviors in the current application to understand components that posed challenges. The feedback provided by the research and outreach to partners has been invaluable. Key suggestions included:

- Reduce documentation requirements
- Consolidate document uploads
- Make the website and application more mobile-friendly
- Provide greater language diversity on the website
- Shorten the length and complexity of the application
- Reorganize the application for easier navigation
- Provide applications with additional status updates regarding their application
- Enhance the “no wrong door” experience for applicants

In addition to making changes to the online application, HCD recognized the need to help applicants who have limited or no internet access. With the help of a network of community-based organizations, HCD provides in-person and phone-based application support. HCD also added capabilities to receive necessary support documents from applicants via SMS text service, reducing the need for scanning or mailing documents. These applicant services are more fully described in the “Program Education and Outreach” section below.

Many recommended changes only became possible to implement after Treasury provided more clear and flexible rent relief program guidance. HCD premiered a more user-friendly, simplified, and trim application and online portal in the first week of June after conducting thorough testing and reviews to confirm current applicants will not be impacted.

After the application improvements have been tested and released, HCD’s program implementer will send email reminders to applicants who are in progress but not yet submitted, letting them know that the process to apply has been simplified and encouraging them to complete and submit their forms. HCD will also utilize media relations efforts, social media campaigns, and outreach partners to help communicate messaging about application changes and ease of use. HCD anticipates sharing the feedback and

assistance it has received with its partner jurisdictions to help Californians across the state access aid.

2. Case Management

Application review includes the process for case management staff and supervisors to review applications and documentation, verify eligibility, validate income and rent calculations, collect landlord payment data, and approve rental or utility payments. Case managers perform a preliminary review of completed applications to determine applicant eligibility and consistency with state and federal law. Case managers compare each application against established requirements (e.g., standards) to verify all data is satisfactory and complete. Upon completion of the preliminary review, applications will be approved, denied, or paused due to insufficient or incomplete information. Paused applications receive a secondary check for remediation, where case managers will request and then review missing or clarifying documentation. Applicants may also appeal a denial, which would trigger an additional review by a case manager and supervisor to affirm or reject the original denial.

Case managers proactively reach out to landlords to gain cooperation on behalf of tenants submitting applications. This effort includes sharing information with landlords as to the benefits of the program.

3. Call Center

The Call Center is available to both tenants and landlords to answer questions and assist applicants in completing the application in English, Spanish, Korean, Vietnamese, Mandarin, and Cantonese. Additional language support is available for more than 200 languages through on-call translation services. Through May 31, 2021, the Call Center has successfully managed the flow of calls, as evidenced by the average wait time of approximately four seconds for a volume of over 221,500 calls since opening.

4. Program Integrity and Duplication of Benefits

HCD incorporates fraud prevention in the application process, and implementation staff and case management staff are trained on identifying and addressing fraud while reviewing applications and supporting documentation. Both application forms and documentation requirements are carefully evaluated for fraud risks, and training identifies

potential red flags so that reviewers can take appropriate action. Certain self-attestations and self-certifications are allowed but avoided as much as feasible to reduce the risk of fraud. HCD's vendor shall deny program assistance to an applicant or terminate program assistance for a participant if a preponderance of the evidence shows the participant willfully and intentionally committed fraud, bribery, or any other corrupt or criminal act in connection with the program.

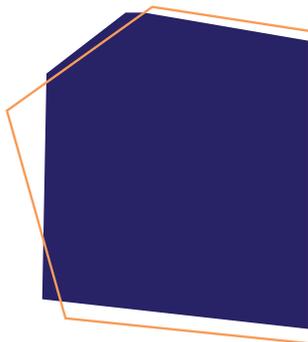
Fraud and abuse can consist of either a single act or a pattern of actions made with the intent to deceive or mislead, and which constitutes a false statement, omission, or concealment of a substantive fact. Fraud and abuse could result in the payment of program funds in violation of program requirements.

In determining whether a case of fraud or abuse exists, HCD's vendor must recognize the differences between unintentional and intentional misreporting. HCD's vendor must also evaluate the special circumstances and seriousness of a case to determine whether further investigation for evidence of fraud or abuse is required.

If the eligible household is the applicant, HCD will engage the landlord to confirm the rent in arrears identified by the eligible household in the application. HCD protects personal information related to the applicant such as income, race, and ethnicity, and disability status from the landlord review. If the applicant is the landlord, HCD engages the eligible household to confirm the information provided by the landlord, including the amount of rent in arrears. If discrepancies exist, or verification cannot be accomplished through a review of the provided documents, HCD's vendors are required to initiate further investigation.

For Option A jurisdictions, HCD established data exchanges to check applications against prior rental assistance received through other programs. For Option C jurisdictions, data exchanges are established, or in process of being established,

to address the risk of duplication of benefits. The data exchanges with Option C jurisdictions address the risk of an applicant submitting multiple applications against both the state and local programs. HCD's vendor checks all applications running through the state program to address the risk of duplication of benefits and removes duplicate applications.



f. HCD's California COVID-19 Rent Relief Program Education and Outreach

1. Traditional Media and Social Media Education and Outreach

HCD's first wide-scale education and outreach campaign began on March 15. This campaign used English, Spanish, Chinese, Tagalog, and Korean radio ads and geographically targeted digital ads to reach low-income renters over 18 and their landlords. HCD's second campaign began on April 12 and ended on May 23. The second campaign featured similar radio and digital ads as the first campaign. To further ensure language is not a barrier to program access, it also featured advertisements in Spanish, Chinese, Vietnamese, Tagalog, and Korean language print media. Finally, the second campaign featured out-of-home advertisements on billboards, transit shelters, and gas pump toppers. HCD intentionally selected these locations to provide program information and awareness to eligible households most in need and their landlords. HCD continues to work with the Governor's Office, stakeholders, media consultants, and the local partner network to better tailor education and outreach materials to communities most in need including indigenous, Black, and Asian American and Pacific Islander communities.

In late February, HCD began producing an ERAP awareness toolkit to provide to program partners. The toolkit includes prerecorded radio advertisements, videos, social media posts, and posters. Toolkit materials seek to inform eligible landlords and eligible households of their eligibility for the program and help them apply for assistance. Most toolkit materials are available in California's main languages: English, Spanish, Tagalog, Vietnamese, Mandarin, and Korean. As of April 30, 2021, all Option A jurisdictions, all Option C jurisdictions, several utility companies, and over 100 community-based partners had received the toolkit. There are also materials available for anyone to download and share at <https://housing.ca.gov/>.

Additionally, beginning in January, HCD started creating an ERAP website landing page on the HousingIsKey website. HCD designed the landing page to contain information about the California COVID-19 Rent Relief Program and the portal for eligible individuals to apply to the California COVID-19 Rent Relief Program. In addition, before the March 15 launch date, HCD launched an eligibility quiz on the landing page to help direct Option B and C applicants to their local

program. The HousingIsKey website is viewable in nearly 100 languages.

2. Implementation and Ongoing Efforts of the Community Based Partner Network

Beginning in February, HCD started onboarding and activating a statewide network of community-based organizations to:

1. Inform the public and key communities about the rental and utility assistance programs.
2. Conduct circuit rider / door-to-door outreach as needed.
3. Provide in-person, COVID-safe appointments to applicants as needed.
4. Advise the program on the communications and education implementation efforts on such matters as content/materials and outreach targets.
5. Advise the program on the fund disbursement implementation efforts on such matters as program design, best practices in delivery technology solutions to geographically remote, linguistically diverse, low technical proficiency, those with limited or no broadband access and/or those without bank accounts.

In late February, these partners began helping applicants access the application portal by providing the following programming:

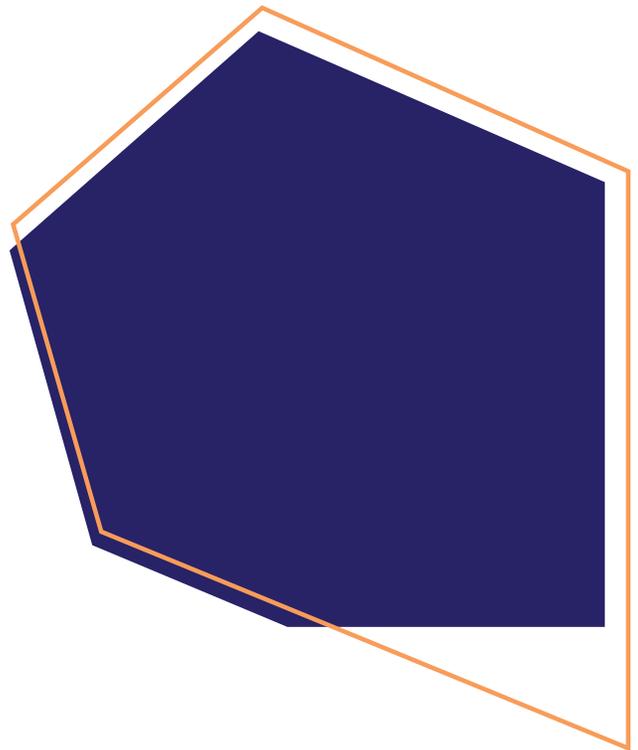
- Outreach via email, public announcements, text messaging, flyers, community social meeting postings, etc.
- Front door visits to applicants that requested an appointment to assist with application completion.
- Literature drops in neighborhoods/zip codes that are at high risk of eviction where the applicant rate is low.
- In-person, phone, and virtual appointments with applicants as requested (launched week of April 12)
- Webinars in English and in-language regarding the application process.
- Technical assistance to help applicants complete applications.
- Call Center that can make appointments for members of the public that would like to attend an partner network in-person appointment.

As of May 31, 2021, HCD had confirmed partnerships with approximately 102 community-based partners across the state to provide the services noted above. These partners give culturally aware information and technical assistance to applicants in over 30 languages. Efforts to recruit community-based partners are ongoing. HCD recruits and activates additional community-based organizations to respond to ongoing programmatic outcomes, especially concerning specific geographies, shared language groups, or given cultural communities. HCD identifies where it can better serve households most in need of assistance in partnership with the urban intelligence organization UrbanFootprint. The data, mapping, and analytics platform from UrbanFootprint helps HCD and its Local Partner Network understand income and unemployment shifts, underlying health conditions, economic stress, rental property locations, and other demographics at the state, city, and neighborhood levels. These data help HCD identify areas with high levels of eviction risk and inform the program's comprehensive education and outreach approach. As of April 23, 2021, UrbanFootprint and HCD had identified 476,000 households in Option A and C jurisdictions at risk of eviction. 93 percent of these households are within 25 miles of a community-based partner organization.

Furthermore, on April 26, HCD and its partners launched an SMS text service that allows applicants to provide required documents through SMS texting. Inbound documents are directed (via the text service) to an email inbox that is directly accessed by the HCD rental assistance case management team. HCD launched this service in partnership with the United Way and its community-based partners to help reduce applicants' need for internet access and fluency, digital files and/or scanners, and related infrastructure.

The partners described above serve both eligible landlords and tenant households. HCD has also held several webinars in conjunction with landlord organizations to help eligible landlords apply for relief. From January to May, HCD also provided these partners with relevant communications materials. These materials were made available to landlords across the state through sources they are already familiar with. Throughout April and May, case managers reviewing tenant applications contacted landlords seeking cooperation on behalf of tenants. This effort included sharing information and educating landlords about the rental assistance program's benefits to them. If their tenant completes an

application for assistance before them, landlords also receive an email containing programmatic information and inviting them to apply. HCD has and will continue to work with landlord groups to ensure these communications are clear, concise, and appropriately targeted.



g. Challenges

As described above, HCD and its partners throughout the state were able to establish a new statewide program to help extremely vulnerable populations in less than 90 days following the passage of SB 91. The effort involved overcoming many challenges in varying levels of complexity. A few of those challenges are notable as they may offer opportunities for other programs to leverage the solutions.

1. Challenges HCD has Resolved

Challenge: To make ERAP relief available to renters most in need, HCD recognized that the application process needed to be very accessible in form and broad in its provisions related to documentation evidence and eligibility, while balancing the risk of fraud and the duplication of benefits.

Resolution: Before approving any applications for payment, HCD teamed with several public and private entities to develop a coordinated fraud prevention approach. These entities verify applicant information against a variety of sources. Taking lessons from similar emergency aid programs that preceded it, HCD established internal pre-payment review processes and post-payment audit processes with parties both inside and outside of HCD. External entities include the State Controller's Office, Department of Corrections and Rehabilitation, and the Department of the Military.

Challenge: The array of emergency rental assistance programs offered at the city, county, regional, and state levels works well to adapt program delivery to varying needs across the state. But the variety of programs and different avenues for applying caused confusion among tenants and landlords seeking the proper entry point to start an application.

Resolution: HCD created a public website with simple questions and a searchable mapping tool to help renters and landlords find the appropriate place to start their application. The website at https://housing.ca.gov/covid_rr/ offers information about tenant and landlord eligibility along with local partner assistance locations. The site also provides a dynamic map for tenants and landlords to learn "Which Jurisdiction Do I Apply To?" By entering the residence address or clicking on the map, users are directed to the appropriate state or local jurisdiction that serves them. HCD has been updating the results frequently to keep up with changes

to locally administered programs. HCD's outreach and educational campaigns, in partnership with local partners' own campaigns, also seek to alleviate confusion.

Challenge: Utility providers across the state were not initially aware of how to coordinate with state and local rental assistance programs that offered to pay renters' utility arrearages or even if they were required to do so.

Resolution: BCSH Agency and HCD identified the need for coordination across all regions to gain consistent commitments from utility providers, particularly those that were not part of the same municipalities operating the emergency rental assistance programs. By working with the CPUC, BCSH Agency and HCD garnered the regulator's support directing the utility companies throughout California to cooperate, support, and provide arrears balance amounts connected with ERAP applications seeking utility payment assistance.

2. Challenges HCD Continues to Address

Federal and state statutes governing emergency rental assistance are primarily in alignment but differ in two key areas. First, SB 91 limits the ERAP payments made to landlords to 80 percent of the rental arrears owed by a tenant, though the federal statute allows for full payment of rental arrears. Second, SB 91 provides eligible jurisdictions three different options for administering their programs:

1. Option A: HCD administers the proportionate shares of state and federal funds on a jurisdiction's behalf in conformity with SB 91.
2. Option B: The jurisdiction administers its allocations of state and federal funds in conformity with SB 91.
3. Option C: The jurisdiction administers its direct federal allocation in conformity with federal rules, and HCD administers the proportionate share of allocated state funds on the jurisdiction's behalf in conformity with SB 91.

Challenge: The differences between state and federal limits for rental arrears payments have confused landlords and added complexity to program operations. HCD continues to field questions, comments, and complaints from landlords and local jurisdictions related to the requirement for landlords to consider partial repayment of rent arrears to be "paid in full."

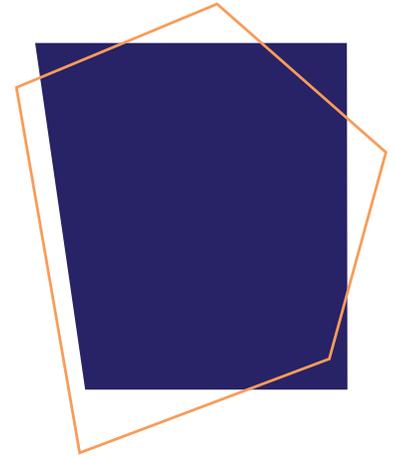
Some landlords have determined the repayment cap is based on state rules and not federal, which creates confusion when they believe ERAP to be a federally funded program.

Challenge: Jurisdictions electing to run separate local programs in parallel – but not in conformity – with the state-run program amplify the confusion about federal limits on rent arrears compared to state limits. Landlords and renters at the same address in such Option C jurisdictions may receive different information about the types and amounts of assistance available to them depending on whether they contact the state or local program, the submittal date on their application, and whether the tenant or landlord initiates the application. Compounding the complexity of this challenge, each of the Option C jurisdictions has a unique formula and program based on application dates, income levels, and applicant types.

Challenge: When a jurisdiction opts to run a program in parallel with the state-run rental assistance program, both organizations must take proactive steps to identify, isolate, and resolve duplicate applications before either entity makes a monetary award. Lacking such de-duplication processes increases the programmatic risk of paying applicants in excess or duplicating benefits, in violation of federal law. Addressing the risk of the duplication of benefits, such as adding steps to continually search for and isolate possible duplicates, increases application processing time and delays payments to all beneficiaries.

Challenge: Although the state statute, SB 91, was only signed into law in late January 2021, it established an end date of March 31, 2021, for consideration of eligible rent arrears. Given that the state-administered program opened as required on March 15, 2021, the actual timeframe of many applicants' late rent payments can extend to April or May before HCD or local jurisdictions' programs can issue payments. SB 91 provides for partial payment of "prospective rent" to help cover future months. However, applications submitted by tenants or processed by the state and local programs after April 1 are not eligible for "prospective" on-time payments for rent due on the first of the month after the March 31 eligibility deadline.

Resolutions in progress: HCD and its parent agency, BCSH, have been working closely with the Governor's Office, State Legislature, Treasury, and all local jurisdictions to create practical, workable solutions for the challenges noted above. Collaboration among all parties is helping identify and establish approaches to address the varied needs and priorities of renters, landlords, and utility providers across California's varied communities and demographics.



Appendices



Appendix I. Statutory Basis for Report

(d) (1) The department shall submit to the Joint Legislative Budget Committee, on a monthly basis for the duration of the program, **a report that provides programmatic performance metrics for funds administered pursuant to this chapter.** The report shall include, at minimum, the following information:

(A) Obligation of funds for assistance provided under this chapter.

- \$126,158,948.58 obligated for jurisdictions in the State-Administered Program (Option A) and \$22,796,001.02 obligated for the State-Administered portion of Dual Implementation jurisdictions (Option C) as of 5/31/2021

(B) Expenditure of funds for assistance provided under this chapter.

- \$30,857,790.41 expended for jurisdictions in the State-Administered Program (Option A) and \$1,329,115.00 expended for the State-Administered portion of Dual Implementation jurisdictions (Option C) as of 5/31/2021

(C) Expenditure by eligible uses for assistance provided pursuant to this chapter.

- All expenditures applied to rent and utilities arrears.

(D) Reallocation of funds, if any, for assistance provided pursuant to this chapter.

- No reallocation of funds as of 5/31/2021.

(E) Geographic distribution of funds provided pursuant to Section 50897.3.

- Please see Appendix III on page 29 and Appendix IV on page 30.

(F) For the first monthly report submitted pursuant to this section only, an overview of which jurisdictions have elected to participate in the state rental assistance programs as provided in Sections 50897.2 and 50897.3, respectively.

- Please see Appendix IV on page 30 and Program Implementation Options on page 11 of this report.

Appendix II. Definitions

Any capitalized terms that are not defined below have the definitions set forth in SB 91.

“Area Median Income (AMI)” – Income data that will be used to determine household eligibility and is aligned with the U.S. Department of Housing and Urban Development (HUD) Adjusted Median Family Income (HAMFI) as established for county and metropolitan statistical areas and as updated annually.

“Expenditure (Expended)”– Shall mean a full and complete liquidation of funds.

“Large Jurisdiction” or “Jurisdiction” – A Locality with more than 200,000 in population that is eligible to receive funds directly from Treasury.

“Small Jurisdiction” – A county and the incorporated cities within the counties with less than 200,000 in total population that is not eligible to receive funds directly from Treasury.

“Obligation (Obligated)” – Funds that have been identified for and committed to an Eligible Household or Eligible Landlord pending final application approval.

“Rent” – Includes rent, fees, interest, or any other financial obligation under a lease for use and occupancy of the leased premises but does not include liability for torts or damage to the property beyond ordinary wear and tear.

“Utilities” – Includes utilities and home energy costs eligible for financial assistance pursuant to Section 501(c)(2)(A) of Subtitle A of Title V of Division N of the federal Consolidated Appropriations Act, 2021 (Public Law 116-260). Utility and home energy costs include separately stated electricity, gas, water, sewer, trash removal, and energy cost, such as fuel oil.

Appendix III. Map of jurisdictions implementation model



Appendix IV. Allocation tables

Federal Coronavirus Relief Funds Emergency Rental Assistance Program Reservation Table Small Counties (<200,000)

Counties and the Cities that fall within them	State Financial Assistance
ALPINE	\$ 81,501.34
AMADOR	\$ 2,869,655.61
CALAVERAS	\$ 3,313,834.29
COLUSA	\$ 1,555,455.56
DEL NORTE	\$ 2,007,719.41
EL DORADO	\$ 13,921,135.97
GLENN	\$ 2,049,661.19
HUMBOLDT	\$ 9,785,791.29
IMPERIAL	\$ 13,081,722.72
INYO	\$ 1,302,216.68
KINGS	\$ 11,040,579.82
LAKE	\$ 4,647,958.50
LASSEN	\$ 2,207,033.13
MADERA	\$ 11,357,272.80
MARIPOSA	\$ 1,241,866.71
MENDOCINO	\$ 6,262,320.25
MODOC	\$ 638,222.61
MONO	\$ 1,042,697.36
NAPA	\$ 9,943,596.36
NEVADA	\$ 7,201,209.89
PLUMAS	\$ 1,357,657.81
SAN BENITO	\$ 4,534,044.31
SHASTA	\$ 12,999,788.25
SIERRA	\$ 216,927.83
SISKIYOU	\$ 3,143,035.21
SUTTER	\$ 7,000,235.82
TEHAMA	\$ 4,698,346.39
TRINITY	\$ 886,841.40
TUOLUMNE	\$ 3,932,710.26
YUBA	\$ 5,678,961.23
Total	\$ 150,000,000.00

Option A Jurisdictions

COUNTY / City	Federal Financial Assistance Administered through State	Federal State Admin 8.5%	Federal Local Admin 1.5%	State Financial Assistance	State Financial Assistance State Admin 10%
BUTTE	\$5,865,102.36	\$553,926.33	\$97,751.71	\$7,101,462.92	\$789,051.44
CONTRA COSTA	\$30,866,698.17	\$2,915,188.16	\$514,444.97	\$37,373,382.09	\$4,152,598.01
LOS ANGELES	\$144,066,069.63	\$13,606,239.91	\$2,401,101.16	\$174,435,122.20	\$19,381,680.25
Fontana	\$5,740,969.41	\$542,202.67	\$95,682.82	\$6,951,162.79	\$772,351.42
SAN LUIS OBISPO	\$7,575,643.53	\$715,477.44	\$126,260.73	\$9,172,585.25	\$1,019,176.14
SAN MATEO	\$20,512,391.94	\$1,937,281.46	\$341,873.20	\$24,836,393.48	\$2,759,599.28
SANTA CRUZ	\$7,310,787.30	\$690,463.25	\$121,846.45	\$8,851,897.43	\$983,544.16
TULARE	\$12,474,708.30	\$1,178,166.90	\$207,911.80	\$15,104,370.30	\$1,678,263.37
VENTURA	\$17,048,549.43	\$1,610,140.78	\$284,142.49	\$20,642,374.83	\$2,293,597.20
Oxnard	\$5,589,355.41	\$527,883.57	\$93,155.92	\$6,767,588.61	\$751,954.29
YOLO	\$5,900,263.11	\$557,247.07	\$98,337.72	\$7,144,035.55	\$793,781.73
Total COUNTY / City	\$262,950,538.59	\$24,834,217.54	\$4,382,508.97	\$318,380,375.45	\$35,375,597.29

Option B

COUNTY / City	Federal Financial Assistance (Includes Local Admin)	State Block Grant Direct Financial Assistance	State Block Grant Local Admin 8.5%	State Block Grant State Admin 1.5%
ALAMEDA	\$29,648,131.00	\$32,308,147.49	\$3,051,325.04	\$538,469.12
Fremont	\$7,168,619.00	\$7,811,784.18	\$737,779.62	\$130,196.40
FRESNO	\$13,900,330.20	\$15,147,461.31	\$1,430,593.57	\$252,457.69
Fresno	\$15,804,677.70	\$17,222,665.94	\$1,626,585.12	\$287,044.43
KERN	\$15,343,270.80	\$16,719,861.91	\$1,579,098.07	\$278,664.37
Bakersfield	\$11,421,298.00	\$12,446,011.50	\$1,175,456.64	\$207,433.53
Long Beach	\$13,754,733.90	\$14,988,802.17	\$1,415,609.09	\$249,813.37
Los Angeles	\$118,319,705.80	\$128,935,294.38	\$12,177,222.25	\$2,148,921.57
MARIN	\$7,695,346.50	\$8,385,769.37	\$791,989.33	\$139,762.82
MONTEREY	\$12,905,387.40	\$14,063,252.67	\$1,328,196.09	\$234,387.54
Anaheim	\$10,416,959.90	\$11,351,564.70	\$1,072,092.22	\$189,192.74
Irvine	\$8,544,930.90	\$9,311,578.05	\$879,426.82	\$155,192.97
SACRAMENTO	\$30,874,446.30	\$33,644,487.13	\$3,177,534.89	\$560,741.45
Sacramento	\$15,270,933.50	\$16,641,034.53	\$1,571,653.26	\$277,350.58
SAN DIEGO	\$48,759,661.70	\$53,199,154.19	\$5,024,364.56	\$886,652.57
Chula Vista	\$8,161,123.90	\$8,828,537.57	\$833,806.33	\$147,142.29
San Diego	\$42,333,563.00	\$46,131,710.47	\$4,356,883.77	\$768,861.84
SAN JOAQUIN	\$13,362,958.80	\$14,561,877.20	\$1,375,288.40	\$242,697.95
Stockton	\$9,297,024.90	\$10,131,149.59	\$956,830.79	\$168,852.49
SONOMA	\$14,697,467.80	\$16,016,117.71	\$1,512,633.34	\$266,935.30
STANISLAUS	\$9,973,927.30	\$10,868,783.41	\$1,026,496.21	\$181,146.39
Modesto	\$6,398,150.80	\$6,972,189.90	\$658,484.60	\$116,203.17
Total COUNTY / City	\$464,052,649.10	\$505,687,235.37	\$47,759,350.01	\$8,428,120.58



Option C

COUNTY / City	Federal Financial Assistance	Federal Financial Assistance Local Admin 10%	State Financial Assistance	State Financial Assistance State Admin 10%
Oakland	\$11,587,287.33	\$1,287,476.37	\$14,029,881.44	\$1,558,875.72
Santa Clarita	\$5,699,011.95	\$633,223.55	\$6,900,360.76	\$766,706.75
MERCED	\$7,430,317.74	\$825,590.86	\$8,996,624.90	\$999,624.99
ORANGE	\$59,018,900.67	\$6,557,655.63	\$71,460,054.23	\$7,940,006.03
Santa Ana	\$8,892,352.17	\$988,039.13	\$10,766,855.35	\$1,196,317.26
PLACER	\$10,658,711.61	\$1,184,301.29	\$12,905,562.52	\$1,433,951.39
RIVERSIDE	\$51,540,497.73	\$5,726,721.97	\$62,405,207.87	\$6,933,911.98
Moreno Valley	\$5,701,045.68	\$633,449.52	\$6,902,823.11	\$766,980.34
Riverside	\$8,866,717.47	\$985,190.83	\$10,735,816.87	\$1,192,868.54
SAN BERNARDINO	\$46,820,902.68	\$5,202,322.52	\$56,690,724.61	\$6,298,969.40
San Bernardino	\$5,774,069.79	\$641,563.31	\$6,991,240.66	\$776,804.52
SAN FRANCISCO	\$23,588,984.43	\$2,620,998.27	\$28,561,530.13	\$3,173,503.35
SANTA BARBARA	\$11,947,671.63	\$1,327,519.07	\$14,466,234.60	\$1,607,359.40
SANTA CLARA	\$24,244,783.38	\$2,693,864.82	\$29,355,571.05	\$3,261,730.12
San Jose	\$27,341,765.91	\$3,037,973.99	\$33,105,395.93	\$3,678,377.33
SOLANO	\$11,978,283.42	\$1,330,920.38	\$14,503,299.35	\$1,611,477.70
Total COUNTY / City	\$321,091,303.59	\$35,676,811.51	\$388,777,183.38	\$43,197,464.82



Appendix V. Summary of bifurcations between local and state programs

Locality	Bifurcation Method	Transition Date	MOU Status	Local Program Open Date	Local Program Close Date
City and County of San Francisco https://sf.gov/renthelp	State to process rent arrears from 4/1/20 to 3/31/21; Locality to process current and prospective rents 4/1/2021 forward.	No bifurcation transition; the proposed split is for the life of the funding.	Executed	05/28/21	
City of Moreno Valley http://www.moval.org/rentalrescue/	Locality to deploy federal funds until 6/30/21; then state will take over.	Bifurcation transition is 7/1 or 100% local expenditure, whichever occurs first.	Executed	approx 3/19/2021	
City of Oakland https://www.oakland-ca.gov/resources/housing-resources-erap-emergency-rental-assistance	State to process tenants with household income greater than or equal to 30% Area Median Income (AMI) and landlords unless 100% Restricted Affordable Housing projects. Local program to process AMI < 30%.	No bifurcation transition; the proposed split is for the life of the funding.	Executed	04/01/21	05/17/21
City of Riverside https://www.riversideca.gov/homelessolutions/housing-authority/riverside-rental-assistance-program	Locality provides full assistance from 3/9 to 7/31 State provides assistance after 7/31 through program close.	Bifurcation transition is 8/1 or until 100% local expenditure, whichever occurs first.	Executed	03/09/21	Prior to 5/26/21
City of San Bernardino http://sbcity.org/city-hall/community_n_economic_development/housing/eviction_prevention_program.asp	Locality to provide full assistance until 6/30/21. State to provide full assistance from 7/1/21 through close of program.	Bifurcation transition 7/1/21.	Executed	11/1/2020	

Locality	Bifurcation Method	Transition Date	MOU Status	Local Program Open Date	Local Program Close Date
<p>City of San Jose</p> <p>https://www.sanjoseca.gov/your-government/departments-offices/housing/covid-19-resources/rental-assistance</p>	<p>State to provide full assistance until 4/30/2021 then transition to local program bifurcation in which state assists all households with income greater than 30% AMI; locality focuses on households with incomes at or below 30% AMI.</p>	<p>State provides assistance through 4/30/2021, then state/local bifurcation begins and operates through life of the program.</p>	<p>Draft received</p>	<p>approx 5/19/21 (thru Santa Clara County)</p>	
<p>City of Santa Ana</p> <p>https://www.santa-ana.org/covid19/rental-relief</p>	<p>Locality assists tenants with non-participating landlords paying tenants a maximum assistance of \$5,500. State will assist all tenants with participating landlords.</p>	<p>No bifurcation transition; the proposed split is for the life of the funding.</p>	<p>Executed</p>	<p>2/1/2021</p>	
<p>County of Merced</p> <p>https://www.mercedcaa.com/v2/wp-content/uploads/2020/08/Covid19_Rent_Brochure.docx.pdf</p>	<p>Locality to assist tenants with an AMI of 50% or less. State will assist tenants with AMI greater than 50%.</p>	<p>No bifurcation transition; the proposed split is for the life of the funding.</p>	<p>Executed</p>	<p>3/15/2021</p>	
<p>Orange County</p> <p>https://www.ochealthinfo.com/about-hca/directors-office/office-care-coordination/emergency-rental-assistance-programhttps://www.ochealthinfo.com/about-hca/directors-office/office-care-coordination/emergency-rental-assistance-program</p>	<p>Locality to assist 100% until 4/30/21, then state program takes over.</p>	<p>5/1/21, transition to the state program.</p>	<p>Executed</p>	<p>2/1/2021</p>	<p>4/30/2021</p>
<p>Placer County</p> <p>https://renthelpplacer.com/https://renthelpplacer.com/</p>	<p>Locality to assist 100% until 4/30/21, then state program takes over.</p>	<p>5/1/21, transition to the state program.</p>	<p>Executed</p>	<p>3/22/2021</p>	<p>4/30/2021</p>



Locality	Bifurcation Method	Transition Date	MOU Status	Local Program Open Date	Local Program Close Date
Riverside County https://www.unitedlift.org	Locality program until 6/30/21, then starting 7/1/21, state program will assist.	7/1/21, transition to the state program.	Draft received	approx 3/15/2021	
San Bernardino County https://sbcounty.cdha.com/community-development-and-housing-department	Locality to assist tenants with an AMI of 50% or less. State will assist tenants with AMI of greater than 50%.	No bifurcation transition; the proposed split is for the life of the funding.	Executed	4/12/2021	
Santa Barbara County https://www.united-waysb.org/rent	Locality to assist until funds are exhausted. Locality will provide state 3 days notice once funds exhausted.	No bifurcation transition; the proposed split is for the life of the funding.	Executed	2/15/2021	5/8/2021
Santa Clara County https://www.sccgov.org/sites/covid19/pages/rental-assistance.aspx	State to provide full assistance until 4/30/2021 then transition to local program bifurcation in which state assists all households with income greater than 30% AMI; locality focuses on households with incomes at or below 30% AMI.	State provides assistance through 4/30/2021, then state/local bifurcation begins and operates through life of the program.	Draft received	approx 5/19/21	
Solano County https://www.ccyoso.org/housing	Locality to assist 100% until 7/31/21, then 8/1/21 state takes over.	Bifurcation transition will occur on 8/1/21 or when the locality has expended 100% of their funds, whichever occurs first.	Executed	4/22/2021	
City of Santa Clarita COVID-19 Rental Assistance Program City of Santa Clarita, CA (santa-clarita.com)	Locality to accept applications until 4/30/2021 and process applications received. Locality will redirect applicants to state program 5/1/2021-forward.	Transition to the state program occurs on 5/1/21.	Executed	4/1/2021	



Appendix VI. Recapture and Reallocation

At the time of this report's publication, HCD had not recaptured or reallocated any funds.



Appendix VII. Local Partner Network (LPN)

Geographic coverage in Rounds 1, 2, 3 and 4

County	Partners
Alameda	18
Alpine	2
Butte	4
Calaveras	1
Colusa	3
Contra Costa	11
Fresno	4
Glenn	4
Humboldt	1
Imperial	8
Inyo	2
Kern	5
Kings	3
Lake	1
Los Angeles	24
Madera	5

County	Partners
Mariposa	2
Mendocino	1
Merced	6
Mono	3
Monterey	2
Nevada	2
Orange	12
Placer	4
Riverside	12
Sacramento	8
San Bernardino	11
San Diego	7
San Francisco	10
San Joaquin	5
San Luis Obispo	6

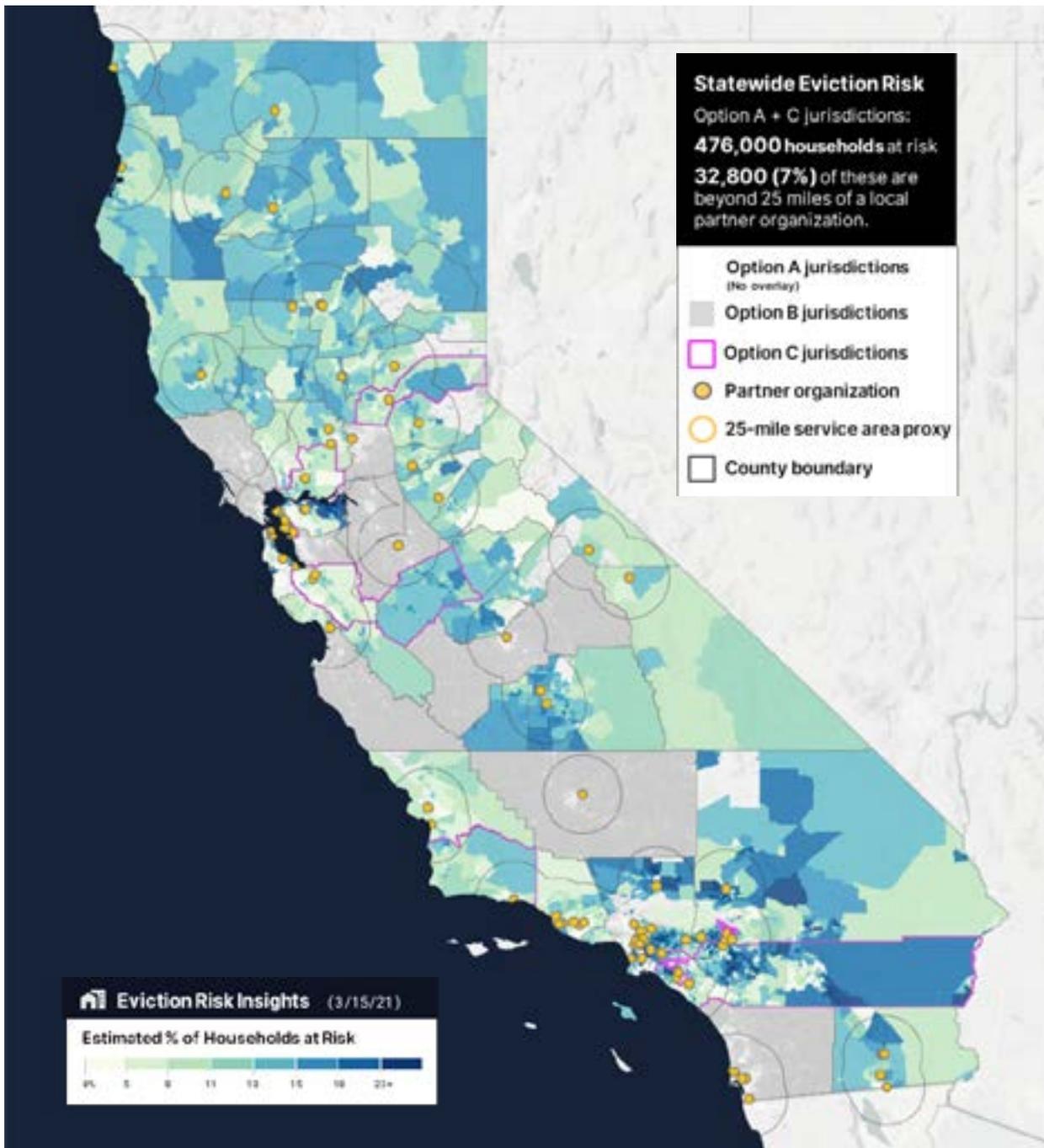
County	Partners
San Mateo	4
Santa Barbara	7
Santa Clara	5
Santa Cruz	3
Shasta	2
Solano	6
Sonoma	2
Stanislaus	5
Sutter	5
Tehama	3
Trinity	3
Tulare	4
Ventura	11
Yolo	4
Yuba	4

Local Partner Network Language coverage in Rounds 1, 2, 3 and 4

Language	Partners
Arabic	16
Armenian	15
Austronesian	12
Chinese (Cantonese)	22
Chinese (Mandarin)	22
Farsi	2
French	13
German	12
Hindi	19
Hmong	19
Japanese	12
Khmer	12

Language	Partners
Korean	19
Other Indo-European	12
Persian	15
Portuguese	14
Punjabi	15
Russian	18
Spanish	96
Tagalog	24
Tai-Kadai	11
Vietnamese	15
Other Languages	9

Coverage of Local Partner Network compared to jurisdiction boundaries and eviction risk insights



Option A, B, and C designations and LISC partner locations are current as of 4/23/21. ERI reflects data as of 3/15/21.

Appendix VIII. CPUC Support for State Rental Assistance Program

STATE OF CALIFORNIA

GAVIN NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 15, 2021
VIA E-MAIL

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Rm. 2343
San Francisco, CA 94105
ebj1@pge.com

Tara Kaushik
Managing Director, Regulatory Relations
Southern California Edison Company
601 Van Ness Ave, Suite 2030
San Francisco, CA 94102
Tara.kaushik@sce.com

Pooja Kishore, Regulatory Affairs Manager
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, Oregon 97232
pooja.kishore@pacificorp.com

Keith Switzer, VP of Reg Affairs
Bear Valley Electric Service
Golden State Water Company
630 E Foothill Blvd
San Dimas, CA 91773
KSwitzer@gswater.com

Valerie Ontiveros, Regulatory Manager
Southwest Gas Corporation
5241 Spring Mountain road
Las Vegas, NV 89193
Valerie.ontiveros@swgas.com

Raymond J. Czahar
Chief Financial Officer
West Coast Gas Company
9203 Beatty Drive
Sacramento, CA 95826
westgas@aol.com

Edward Jackson
Director, Rates and Regulatory Affairs
Liberty Utilities
933 Eloise Avenue
South Lake Tahoe, CA 96150
edward.jackson@libertyutilities.com

Shivani Sidhar
Director – Regulatory Affairs
SDG&E and SoCalGas (Sempra)
488 8th Avenue
San Diego, CA 92101
Ssidhar1@semprautilities.com

Michael Lamond, CFO/COO
Alpine Natural Gas
15 St. Andrews Road #7
Valley Springs, CA 95252
mike@alpinenaturalgas.com



April 15, 2021

Customer Data Validation for Emergency Rental Assistance Program

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To: Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Southern California Gas Company, Liberty Utilities, Pacific Power, Bear Valley Electric Service, Southwest Gas Corporation, West Coast Gas Company, and Alpine Natural Gas:

Subject: Direction to Conduct Customer Data Validation for Emergency Rental Assistance Program

On December 27, 2020, the federal Consolidated Appropriations Act, 2021 was signed into law, establishing the federal Emergency Rental Assistance Program (ERAP) and authorizing allocations of funds to states, local governments, tribal communities, and territories to assist renters with unpaid rent and utility bills accrued between April 1, 2020, and March 31, 2021. California Senate Bill 91 (2021) established California's program for administering and distributing rental assistance funds, authorizing the California Department of Housing and Community Development (HCD) to administer the funds in accordance with state and federal law, and providing a framework for cities, counties, and tribes that received a direct allocation of funds from the U.S. Treasury to implement ERAP funding in partnership with HCD.

Before distributing funds, HCD and partner cities, counties, and tribes must perform due diligence to validate customer information. The HCD application process requires customers requesting ERAP relief to consent to HCD providing their submitted information to other entities for the purpose of validating eligibility. HCD has requested that IOUs validate customer application information for eligibility purposes once provided by HCD pursuant to the customer's request for ERAP relief.

This letter serves as a notification that the California Public Utilities Commission (CPUC) plans to take action to enable validation of utility customer information between the utilities and HCD and its partner cities, counties, and tribes to facilitate HCD's administration of its ERAP for utility arrearages.

Specifically, the CPUC authorizes each IOU and SMJU to validate utility customer information of applicants for ERAP, upon HCD's request or upon request of a partner city, county, or tribe, for the purpose of administering relief. The data shall not be shared or used for any other purpose. Each IOU and SMJU should implement the validation activities described in this letter immediately.

While the HCD Rental Relief Program is not a CPUC program, the program is an important opportunity to provide much-needed relief to the utility debts of a significant number of Californians. Between February 2020 and February 2021, the large energy IOUs reported an increase in total residential unpaid bills from approximately \$500 million to more than \$1.3 billion in total. Of that amount, nearly half is owed by customers enrolled in income-qualified rate assistance programs California Alternate Rates for Energy (CARE) or Family Electric Rate Assistance (FERA).

In response to this urgent need, the CPUC recently opened a new proceeding, Rulemaking (R.) 21-02-014, to address the increase in utility customer arrearages. In that proceeding, the Administrative Law Judge has emphasized the importance of leveraging ERAP funds to maximize their benefit for

April 15, 2021

Customer Data Validation for Emergency Rental Assistance Program

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California ratepayers, and has specifically directed IOUs to undertake actions to (1) confirm that utility customers can access the resources that have been made available, and (2) expose any barriers to accessing the HCD ERAP relief funding so that barriers may be promptly addressed.

Given the scale of the problem and the need for immediate relief, utilities should dedicate resources to work rapidly to validate the information provided by HCD and its partner cities, counties, and tribes.

I intend to request ratification by the full Commission of the actions directed by this letter at a future Commission business meeting.

Sincerely,



Rachel Peterson
Executive Director