

Last Updated: March 15, 2021

Quality Assurance Reviews

Federal Emergency Rental Assistance Program
(ERAP)



Quality Assurance Reviews

RAAs should develop a review process that is compliant with the new administrative plan and any other guidance administered by DHCD or the Treasury.

Each application file should be reviewed by at least two individuals, the second reviewer does not necessarily need to be a supervisor, unless the benefit amount exceeds \$10,000.

BENEFITS THAT EXCEED \$10,000

- For benefit awards that exceed \$10,000 per household, a supervisor or manager must verify as part of their review, that client documents have an auditable file showing all verifications from previous policies, plus:

1 Copy of tenant signed application, with

- Attestation of COVID-19 impact
- Signed tenant consent, if application filed by a landlord or advocate on behalf of the tenant

2 Documentation of the months of rental/utility arrears and stipends paid, showing

- No payment is covering arrears accrued prior to March 13, 2020
- No arrears payments exceed 12 months
- No household is receiving more than 15 months of benefits

3 For rent:

- Confirmation that this is rental property in Massachusetts (for out of state moves, start-up costs may be covered, but not ongoing rent)
- Copy of transmittal of landlord agreement to participate
- Verification that tenant has also been sent a copy of landlord agreement to participate

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For utilities:

- Copy of utility overdue statement verifying the account number and that the holder's name and address matches the lease or proof of tenancy
- Copy of payment transmittal stating any terms beyond months covered (i.e., initiating an AMP, Cromwell plan, etc.)

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BACKEND FILE REVIEWS

DHCD will conduct back-end file reviews.

BENEFITS AWARDS OF \$35,000+

Benefit awards that exceed \$35,000 per household will be restricted in HAPPY and must be overridden by DHCD. Benefit awards greater than \$35,000 must be escalated.

MANAGER / SUPERVISOR REVIEW REQUIRED ANNOTATION

Managers and supervisors need to annotate their review for benefits of \$10,000 or more using the following language:

“I, First and Last Name, attest that I have reviewed this file (file number) and recommend approval/disapproval”

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DUPLICATION CHECKS IN HAPPY

Duplication checks should continue to be performed in HAPPY:

STEP 1

RAAs should search for the head of household in HAPPY to see if they have received RAFT or ERAP previously. This search should be done by checking for the HOH as a “Member” instead of a “Tenant” to ensure that the search includes households where the HOH may have been a household member on another HOH’s household.

- If they have not received RAFT or ERAP, RAAs can assume there is no duplication of benefits and issue payment.
- If they have received RAFT or ERAP previously, proceed to Step 2.

STEP 2

RAAs should then search to see whether there may be overlapping benefits.

- If there is no potential overlap in payments, RAAs can assume there is no duplication of benefits and issue payment.
- If there is potential overlap/duplication in payments, proceed to Step 3.

STEP 3

If there may be overlap/duplication of benefits, RAAs should investigate whether prior RAFT benefits covered the same time period. This could include requesting a letter or tenant ledger/record of payments from the landlord that clearly specifies which arrears the prior RAFT benefit went toward, and which the current RAFT/ERAP benefit would go toward. If there is no duplication, RAAs should proceed with payment.

Step 1 Example

Household received RAFT in December 2020 for arrears, and the household is now applying for RAFT/ERAP in April 2021 for January – March 2021 arrears. Since the prior RAFT benefit only covered arrears from before December 2020, there is **no overlap with the current request and the RAA can proceed with payment.**

Step 2 Example

Household received RAFT in December 2020 for arrears, and the household is now applying for RAFT/ERAP in April 2021 for November 2020 – March 2021 arrears and April – June 2021 stipends. **Since the request for arrears overlaps with the prior RAFT benefit, there may be duplication of benefits. Proceed to option 3.**

Step 3 Example

Household received RAFT in December 2020 for \$10,000, but that didn’t cover the full arrearage. Household applied again for RAFT/ERAP in April 2021 to cover the remaining arrearage from pre-December 2020 that the prior RAFT payment did not cover. **The RAA should proceed with payment. Even though the time frames overlapped, the prior RAFT benefit and current RAFT/ERAP benefit are covering different portions of the household’s arrears.**