

## ERA1 – ERA2 Transition Guidance for Subrecipients

Posted July 28, 2022

Revised August 8, 2022 to add question 7

*Note: This guidance document is intended for Subrecipients transitioning from an ERA1 HSS contract to an ERA2 HSS contract. Please contact your assigned TDHCA HSS staff members with specific questions.*

- 1. Does my organization have to re-certify clients who were previously eligible and served under the ERA1 program?**
  - a. Subrecipients do not need to re-certify clients' eligibility if their eligibility is up to date and has not lapsed. If eligibility was determined with self-attestation, Subrecipient must re-certify every three (3) months. If eligibility was determined with annual income or categorical eligibility, Subrecipient must update eligibility every 12 months and document in the household file.
  - b. Subrecipients should refer to ERA2 guidance for re-certifying clients' eligibility when required to maintain compliance.
  - c. Clients that are served with both ERA1 and ERA2 funds should maintain the same client ID. The same client file may also be used for recordkeeping purposes, so long as the client is correctly reported on the monthly household report spreadsheet.
  
- 2. Do I have to report ERA2 draws if my organization is still drawing ERA1 funds and has not begun to draw ERA2 funds?**

Yes. Your organization must submit an ERA2 draw for every month, beginning May 15, 2022, for the April 2022 reporting period. If your organization is still drawing ERA1 funds, you will submit an ERA2 program and administrative draw for \$0.
  
- 3. Do I have to fully expend ERA1 funds before drawing ERA2 funds?**

Yes. You must fully expend ERA1 funds before drawing ERA2 funds. This includes administrative funds – you may not begin drawing ERA2 administrative funds until ERA1 funds are fully expended.
  
- 4. When can I begin to draw ERA2 funds?**

As soon as ERA1 funds are fully expended, your organization may begin to draw ERA2 funds.
  
- 5. How do I report if my organization fully expends ERA1 funds in the middle of a reporting period? For example, on July 15<sup>th</sup>.**

Subrecipients should submit both a completed ERA 1 report and a completed ERA 2 report as is required by ERA 1 and ERA 2 HSS contracts. If a Subrecipient expends both ERA 1 and ERA 2 funds in the same reporting month, then they should report their households served and expenditure reimbursements for both ERA 1 and ERA 2. TDHCA's HSS staff will

confirm that all ERA1 funds have been drawn down before approving any ERA2 draws.

**6. How should my organization report clients that have been served by both ERA 1 and ERA 2 funds?**

- a. Existing ERA 1 clients who are served by ERA 2 funds should be reported both in the monthly performance report in the Housing Contract System and the Monthly Household Report Spreadsheet in the ERA 2 Smartsheet Portal.
- b. If a client receives both ERA 1 and ERA 2 assistance in the month of transition to ERA 2, the client should be reported in both the ERA 1 and ERA 2 reports for that month. Direct household payments expended on behalf of the client should be reported on the Monthly Household Report Smartsheet that corresponds with the source of funding (ERA 1 or ERA 2), but should in no circumstances be duplicative on both Smartsheets.
- c. Subrecipients should mark 'No' under the 'First-Time HSS Client' header in the Monthly Household Report Spreadsheet for ERA 2 clients who have been served by ERA 1 in previous months.
- d. It's **imperative** that Client IDs remain consistent across ERA 1 and ERA 2 for clients who receive both ERA 1 and ERA 2 assistance.

**7. Can benchmarks in the ERA2 HSS contracts be amended, since Subrecipients were required to complete ERA1 expenditures, delaying the start of ERA2 activities?**

Yes, once ERA1 HSS contracts are complete, Subrecipients with both ERA1 and ERA2 contracts may request edits to their ERA2 HSS contract benchmarks.