

**DATE:** May 30, 2023

**PROCEDURAL MEMORANDUM #010-23**

**SUBJECT:** Emergency Rental Assistance Program (ERAP) Post Coronavirus Disease of 2019 (COVID-19) Public Health Emergency (PHE) Policy

**TO:** County ERAP Providers

**FROM:** Carl Feldman  
Director  
Bureau of Policy

**PURPOSE**

To inform county ERAP providers of the policy updates effective May 12, 2023, due to the ending of the COVID-19 PHE on May 11, 2023.

**BACKGROUND**

The American Rescue Plan Act of 2021 (ARPA) defines an eligible household as a household of one or more individuals who is obligated to pay rent on a residential dwelling and with respect to which the eligible grantee involved determines that:

- A. One or more individuals within the household has:
  - (i) qualified for unemployment benefits; or
  - (ii) experienced a reduction in household income, incurred significant costs, or experienced other financial hardship during or due, directly or indirectly, to the coronavirus pandemic;
- B. One or more individuals within the household can demonstrate a risk of experiencing homelessness or housing instability; and
- C. The household is a low-income family (as such term is defined in section 3(b) of the United States Housing Act of 1937 ([42 U.S.C. 1437a\(b\)](#))).

Pennsylvania Act 24 of June 30, 2021 stipulates that the funds received through ARPA be administered according to the federal statute regarding the PHE.

## **DISCUSSION**

Beginning May 12, 2023, the following policy updates are in effect.

1. Self-attestation alone of **income** can continue to be utilized as a declaration of income **if** it was being used during the PHE.
  - The guidance indicated in the federal Frequently Asked Questions #4 has been updated, seen below, to allow use of self-attestation of income alone beyond the ending of the PHE on May 11, 2023.  
  
*Self-attestation Alone – Provided that a grantee’s policies and procedures permitted the use of self-attestation alone to establish income as of May 11, 2023, the grantee may rely on a self-attestation of household income without further verification if the applicant confirms in their application or other document that they are unable to provide documentation of their income.*
  - Categorical eligibility and fact-based proxy are **also** allowable to determine income eligibility after May 11, 2023.
2. Self-attestation of **hardship** can continue to be utilized, as federal guidance only asks **if** the applicant suffered a hardship during the COVID-19 pandemic. When answered yes, the applicant meets non-financial eligibility criteria.

## **NEXT STEPS**

1. Share and review this Procedural Memorandum (Memo) with appropriate staff.
2. Direct questions regarding this Procedural Memo to [RA-PWERAPOIM@pa.gov](mailto:RA-PWERAPOIM@pa.gov).
3. This Procedural Memo is in effect until further notice.