

ULA SHORT-TERM EMERGENCY ASSISTANCE PROGRAM GUIDELINES

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TABLE OF CONTENTS

Introduction
Section 1 | Program Administration
Section 2 | General Provisions
Section 3 | Program Requirements: Services and Funding Priorities
Section 4 | Implementation Plan
Section 5 | Contractual Services

Appendices

A. United to House LA Measure

INTRODUCTION

1. Program Summary

a. Goals and Requirements

The Short-Term Emergency Assistance Program seeks to prevent homelessness by ensuring that short-term emergency rental assistance is available to tenants in the City of Los Angeles (City) who are experiencing, or have recently experienced an Economic Hardship. Economic Hardship is defined as one or more individuals within a tenant household having qualified for unemployment benefits or experienced a reduction in household income, incurred significant costs, or experienced other economic impacts, which can be attested to in writing.

Consistent with the United to House LA (ULA) ballot measure and effectuating ordinance, the Short-Term Emergency Assistance Program will provide short-term emergency funding to tenant households at risk of becoming homeless. Funds available through this program are intended to stabilize low-income households at risk of losing their housing due to one-time economic shocks, and may cover the entirety of rent payments for a short-term period of up to six months.¹

The Short-Term Emergency Assistance Program is intended to be implemented consistent with and in coordination with other ULA Homelessness Prevention Programs and services. These Short-Term Emergency Assistance Program Guidelines shall apply to the Los Angeles Housing Department (LAHD) in its administration and execution of the Short-Term Emergency Assistance Program and other ULA Homelessness Prevention Programs. These Short-Term Emergency Assistance Program Guidelines are also applicable to any third party LAHD contracts for the purposes of executing Short-Term Emergency Assistance Program responsibilities.

b. List of subprograms or activities

The Short-Term Emergency Assistance Program will provide emergency rental assistance of up to six (6) months of rent, either arrears or prospective, to landlords on behalf of low-income tenant applicants in the City who are experiencing a loss or decrease in household income due to an Economic Hardship. If a landlord is not responsive to the tenant applicant's or the City's attempts to effectuate payment, a qualified tenant can elect to receive the rental assistance directly. The rental assistance may be provided in a pre-filing mandatory eviction diversion program, provided to preserve and maintain tenancy. Priority eligibility shall be established for households with the lowest income levels and rental arrears of six months or less. Promotion of the Short-Term Emergency Assistance Program will be coordinated with other ULA Homeless Prevention Programs.

¹ Los Angeles Administrative Code Section 22.618.3(d)(2)(i)a.

2. Context

The ULA measure and ordinance require five percent (5%) of the annual tax revenue to be dedicated to a Short-Term Emergency Assistance Program, as a core and proactive strategy to prevent homelessness.

According to the 2022 American Community Survey (ACS) 5-year estimate, there are approximately 886,998 renter households in the city, and approximately 2,245,299 people are renters. Of those renters, approximately 54% are rent-burdened, and 29% are severely rent-burdened.² As of March 31, 2024, approximately 24,000 eviction cases are filed each year in the city. Black and Latinx tenants, especially female heads of households, are disproportionately impacted by evictions. Evictions that ultimately lead to homelessness impose extreme hardship on the people unhoused and significant costs on local and state governments, including but not limited to the costs of emergency shelter, interim and long-term housing, hospital-backed health care, transportation costs, and increased costs associated with child dependency and incarceration.

A landlord's claim of unpaid rent is the most common reason tenants are displaced or evicted. For tenants facing Economic Hardship, such as a loss of household income, injury, or a sudden occurrence of significant costs or debt, many choose to self-evict believing there is no other option than moving out and trying to find replacement housing. The Short-Term Emergency Assistance Program is intended to prevent the potentially disruptive consequences of Economic Hardship by providing emergency rental assistance to qualifying lower-income households.

3. Commitment to Racial Equity

Existing data and scholarship confirms that Black, Latinx, and other communities of color are disproportionately affected by evictions and homelessness. These Short-Term Emergency Assistance Program Guidelines acknowledge that this disproportionality is the result of generations of structural racism. Decades of land use policies, zoning practices, and laws promoting an imbalanced landlord-tenant relationship have reinforced racial segregation, poverty, environmental injustice, and disinvestment that is manifested in the demographics of our contemporary homeless population.

As ULA seeks to combat homelessness through a variety of interventions, the implementation of the Short-Term Emergency Assistance Program is specifically designed to promote racial equity, with a focus on preventing homelessness by making short-term emergency rental assistance available to the city's most vulnerable communities.

Consistent with this commitment to promote racial equity, the Short-Term Emergency Assistance Program is designed to be attuned to the needs and realities of historically marginalized communities, and how racism, as well as disability, transphobia, sexism, and other tenant experiences affect the vulnerability of a tenant, and their experiences.

² Rent burden data from 2023 Comprehensive Housing Affordability Strategy (CHAS) estimates.

4. Program Metrics

The Program Administrator, defined in *Section 1.1* of these Short-Term Emergency Assistance Program Guidelines, shall collect information in accordance with the ULA ordinance and measure reporting requirements and in a manner that supports the evaluation of long-term impacts and outcomes for the Short-Term Emergency Assistance Program. To the extent feasible, this information includes but is not limited to, race, family composition, sexual orientation, age, ability, gender, income, whether someone is formerly homeless, a veteran, a single-parent household, a youth in transition, or a survivor of domestic violence:

Goal	Metrics
Prevent displacement and foster housing stability for lower-income households by mitigating the effects of Economic Hardship on those households by providing short-term emergency rental assistance.	<ul style="list-style-type: none"> ● Number of displacements and evictions. ● Number of Unlawful Detainer filings. ● Number of applications filed in the Short-Term Emergency Assistance Program portal. ● Number of applications for Short-Term Emergency Assistance Program funding approved. ● Number of Short-Term Emergency Assistance Program funding applications that did not receive funding. ● Average household income of approved applications for Short-Term Emergency Assistance Program funding. ● Amount of funding and duration of assistance requested.

Consistent with *Section 5.3* of these Short-Term Emergency Assistance Program Guidelines, LAHD shall analyze these and potentially additional metrics and participant data annually and provide a summary of its analysis to the COC to allow for an assessment of whether the Program is meeting its goals and priorities.

SECTION 1: PROGRAM ADMINISTRATION

1.1 Program Administrator

LAHD shall administer the Short-Term Emergency Assistance Program, with the LAHD General Manager designated as the Short-Term Emergency Assistance Program Administrator (Program Administrator). At their discretion, the LAHD General Manager shall be empowered to delegate and/or revoke administrative responsibilities to Contracting Partner(s), and/or appropriate LAHD staff.

1.2 Selection Process

The Short-Term Emergency Assistance Program is to be administered by LAHD, or its designee, consistent with *Section 1.1* above. Any program partners or outside entity charged with implementing any portions of the Program shall be procured as described in *Section 5*.

SECTION 2: GENERAL PROVISIONS

2.1 Eligible Participants

Eligible Participants include Eligible Tenants and Eligible Landlords.

The Short-Term Emergency Assistance Program shall serve tenants (inclusive of individual tenants and tenant households) in the City seeking short-term rental assistance. Eligible Tenants must meet all of the following criteria: 1) reside in the City, 2) be obligated to pay rent on a residential rental dwelling, 3) be experiencing or have experienced in the previous 24 months, and will attest to, an Economic Hardship (as defined above), and 4) have a household income, as of December 31st of the year prior to application date, at or below 80% of the Area Median Income (AMI) pursuant to the United States Department of Housing and Urban Development thresholds.

A landlord is an Eligible Landlord if they are collecting rent from an Eligible Tenant for a tenancy of a legal residential rental dwelling in the City of Los Angeles.

2.2 Eligible Forms of Funding

ULA allocates 5% of overall annual program revenue to the Short-Term Emergency Assistance Program, for distribution in the form of emergency short-term rental assistance to tenant households at risk of homelessness or displacement. LAHD may seek and allocate additional funding for this Short-Term Emergency Assistance Program, including but not limited to potential grants, consistent with LAHD's general restrictions and requirements; any additional funding sought and received shall not change or limit in any way how ULA funding is allocated or administered.

2.3 Eligible Activities

Eligible activities of the Short-Term Emergency Assistance Program are limited to the payment of short-term rental assistance³ for Eligible Tenants experiencing Economic Hardship. Assistance may be used to pay debt, including rental arrears, or to make prospective payments to preempt the actual financial effects of Economic Hardship. At the discretion of LAHD or its designee, the rental assistance may be provided as part of a pre-filing mandatory eviction diversion program, as a form of eviction prevention.

Eligible activities also include administration of the Short-Term Emergency Assistance Program, including but not limited to the maintenance and operation of the Application Portal as further described in *Section 2.6, Timing / Frequency of Awards*. As further detailed in these Short-Term Emergency Assistance Program Guidelines, Eligible Activities include disbursement of Short-Term Emergency Assistance Program funds directly to the Landlords of Eligible Tenants, and in limited circumstances directly to Eligible Tenants.⁴ Short-Term Emergency Assistance Program funds may be disbursed directly to Eligible Tenants in circumstances where a landlord has been unresponsive after a period of seven (7) business days. Additional details regarding protocols for such activities are provided in *Section 3.1, Scope of Services*.

Activities not identified in this section may still be determined to be eligible activities consistent with the Short-Term Emergency Assistance Program, subject to the discretion of the Program Administrator.

2.4 Ineligible Activities

LAHD employees and their direct family members, or the employees or direct family members of any party contracting with LAHD to support the administration of the program, are ineligible for participation in the Short-Term Emergency Assistance Program. For the purposes of this prohibition, “direct family members” shall be defined as any dependents, household members, parents, siblings, or spouses, or any other such family member as defined by applicable City regulations. Any Application or potential disbursement of funds to LAHD employees and/or their direct family members, or the employees or direct family members of any party contracting with LAHD to support administration of the program, shall be considered an Ineligible Activity warranting rejection of an application.

Current and prior applicants who submit fraudulent or altered documentation or information will automatically become ineligible for the program.

³ Rental assistance shall include any debt or cost incurred by a tenant related to maintaining their rental housing. These costs can include but are not limited to rent, utility payments, security deposits that are associated with complying with orders or agreements and maintaining their rental units.

⁴ These Short-Term Emergency Assistance Program Guidelines acknowledge that disbursements made directly to tenants may result in unintended tax consequences for those tenants. Program participants who would receive disbursements directly may determine that the benefit of assistance, and attendant housing stability, justifies the possible tax consequences. However, direct disbursements to those tenants shall only be transmitted with an acknowledgement of said potential tax consequences, and they shall be informed of these potential consequences prior to being issued direct payments.

2.5 Program Funding – Caps and Limits

The ULA measure and ordinance allocates five percent (5%) of overall annual program revenue to the Short-Term Emergency Assistance Program. Funding allocated to the Short-Term Emergency Assistance Program shall be apportioned and prioritized for the eligible activities identified in these guidelines subject to the approval, discretion, and delegation of LAHD.

Any household receiving a funding disbursement consistent with these Short-Term Emergency Assistance Program Guidelines is limited to receiving no greater than the full amount of up to six (6) months rent of Short-Term Emergency Assistance Program funds, retroactive or prospective, over the course of any twelve (12) month period.

2.6 Timing / Frequency of Awards

Eligible Participants shall submit applications for Short-Term Emergency Assistance Program funding (Applications) through a web-based portal approved or established by LAHD, its designee, or its Contracting Partner(s) (Application Portal). The Application Portal shall be accessible in multiple languages.

Subject to the same time limitations further identified in this *Section 2.6*, the program shall also accept Applications through modes and mediums other than the Application Portal, including by phone and at physical locations where the tenant may be provided assistance completing the Application. Representatives at physical locations shall provide additional technical assistance to help applicants in completing their application.

Contingent on available funding, LAHD may establish multiple application periods per year, or may accept applications on a rolling basis, during which time Applications may be accepted (Application Period). The length of each Application Period shall be defined prior to its commencement. Should LAHD elect to accept Applications on a rolling basis, the Application Period shall be considered indefinite.

Additionally, if the rental assistance is provided as part of a pre-filing mandatory eviction diversion program, applications may be made through a referral process outside of the Application Period.

SECTION 3: PROGRAM REQUIREMENTS: SERVICES AND FUNDING PRIORITIES

3.1 Scope of Services

LAHD, and any entity it contracts with for these purposes, shall effectuate these guidelines and provide services necessary for the execution and performance of the Eligible Activities identified in *Section 2.3* of these Short-Term Emergency Assistance Program Guidelines.

Funding Disbursements

The Short-Term Emergency Assistance Program will provide a one-time payment for rent payments owed in arrears, or prospectively, for up to six (6) months. At the discretion of LAHD or its designee, the rental assistance may be provided as part of a pre-filing diversion

program, as a form of eviction prevention. Total disbursements may be limited by *Section 2.5* of these Short-Term Emergency Assistance Program Guidelines.

Payments shall be made directly to the Applicant's landlord, property management firm, or the landlord's designated agent on behalf of the low-income tenant households at risk of losing housing or being displaced due to Economic Hardship. A tenant household is eligible for funding disbursements equivalent to up to six (6) months of rent, one time over the course of a twelve (12) month period. Except as provided below, disbursements will be made to an Eligible Landlord on behalf of an Eligible Tenant household, which shall equal the total amount awarded for the covered period based on eligibility, and apply only to rental payments owed by the current Eligible Tenant household occupants.

As further specified below, where a landlord has been unresponsive for a period of seven (7) business days, Short-Term Emergency Assistance Program funds shall be made available to be disbursed directly to Eligible Tenants who have been selected for the Program.

Landlord Participation and Compliance

The program shall seek landlord participation in the Short-Term Emergency Assistance Program, including agreement to accept payment upon approval of an Application. Eligible Landlords shall submit a signed W-9 form to LAHD to receive a Short-Term Emergency Assistance Program funding disbursement. The program may, at its discretion, provide assistance to landlords in completing needed participation requirements, such as W-9 forms. As circumstances dictate, LAHD may require additional documentation.

LAHD, as well as other City entities including, but not limited to, the City Attorney's Office, may seek to encourage landlord acceptance of Short-Term Emergency Assistance Program funds by informing them that refusal to do so may constitute a violation of City ordinances, including Article 5.6.1 of the Los Angeles Municipal Code, and State Fair Housing laws prohibiting discrimination based on source of income.

When a landlord's failure to participate or not properly provide the required documentation to the Short-Term Emergency Assistance Program constitutes source of income discrimination, it may subject landlords to monetary penalties. Separate monetary penalties may be assessed for every rental unit for which the landlord refuses to provide timely Short-Term Emergency Assistance Program documentation or accept Short-Term Emergency Assistance Program funding.

All tenant protections, consistent with City, County, State and Federal law, shall remain in place while tenants apply for funding from the Short-Term Emergency Assistance Program and while such Applications are pending or approved and pending funding disbursement. If an Eligible Landlord fails to participate and files an Unlawful Detainer against the tenant, the Program Administrator shall make available documentation that the landlord failed to participate in the Program. Such documentation may be used for an affirmative defense in court proceedings to protect tenants from eviction.

Notwithstanding any conflicting provisions in these Short-Term Emergency Assistance Program Guidelines, at the discretion of the Program Administrator, where the landlord has refused to participate in the Short-Term Emergency Assistance Program or failed to provide documentation within a period of seven (7) business days, payments shall be made

available to be disbursed directly to Eligible Tenants who have been selected for the Program. Direct payments to Eligible Tenants in these circumstances shall not require documentation or demonstration of proof of rental payment to the landlord.

3.2 Program Budget

ULA allocates five percent (5%) of overall annual program revenue to the Short-Term Emergency Assistance Program. Funding will be allocated consistent with *Sections 2.3 and 3.1* of these Short-Term Emergency Assistance Program Guidelines. Funding allocated to the Short-Term Emergency Assistance Program shall be apportioned and prioritized for the Eligible Activities identified in these guidelines subject to the approval, discretion, and delegation of LAHD.

3.3 Funding Priorities

Funding allocated to the Short-Term Emergency Assistance Program shall be apportioned and prioritized for the Eligible Activities identified in these Short-Term Emergency Assistance Program Guidelines subject to the approval, discretion, and/or delegation from the Program Administrator.

Use of Funds

The Short-Term Emergency Assistance Program shall prioritize low-income households with income below 30% AMI, as well as the following priority factors:

- Tenant households living in long-term (at least six continuous years) tenancies of rental units that are subject to the Rent Stabilization Ordinance (RSO).
- Households with disabled and senior tenants who are not participating in the ULA Income Support program.
- Tenants living in deed-restricted affordable housing units.
- Households with minor children tenants.
- Households for whom up to six months' rent in its entirety will satisfy the entire debt for the unit they currently inhabit; or who have entered into an agreement with their landlord to repay the remaining balance affordably.
- Households that are extremely rent burdened, paying more than 50% of total household income for rent each month.
- Households with housing choice vouchers and households living in subsidized affordable housing.
- Households with a maximum monthly rent amount as determined by LAHD.
- Households who are at imminent risk of eviction.

Within these parameters, Applications for short-term rental assistance submitted consistent with *Section 2.6* of these Short-Term Emergency Assistance Program Guidelines will be reviewed and evaluated based on the established priorities (identified in this *Section 3.3*). Based on findings from periodic Needs Assessments required per Los Angeles Administrative Code Section 22.618.6(c)(2) and program reporting, the COC may periodically recommend adjustments to the priority factors in order to better align with areas of identified high need and better achieve the goals of ULA, as provided in Los Angeles Administrative Code Section 22.618.6(c)(10).

The COC may, in its discretion, recommend additional factor(s), consistent with findings from periodic Needs Assessments required per Los Angeles Administrative Code Section 22.618.6(c)(2) and program reporting, in order to better align the Program Guidelines with areas of identified high need and better achieve the goals of ULA, as provided in Los Angeles Administrative Code Section 22.618.6(c)(10). Inclusion of additional factor(s) at that time shall have the effect of amending this *Section 3.3* of these Short-Term Emergency Assistance Program Guidelines, with additional factor(s) carried forward as Priority Factor(s) in subsequent Application evaluations unless 1) the COC subsequently removes that factor(s), or 2) in implementing the factor(s), the COC establishes a sunset period for that factor(s) at that time.

The COC may consider establishing Short-Term Emergency Assistance Program Priority Factors in tandem with Income Assistance Program priorities to maximize strategies to prevent homelessness and displacement of the City's most vulnerable demographics and populations.

SECTION 4: IMPLEMENTATION PLAN

The LAHD General Manager shall identify the number and required level of experience of necessary staff to administer the day-to-day responsibilities of the Short-Term Emergency Assistance Program, and seek to fill those positions expediently. Upon availability of funds, adoption of these Short-Term Emergency Assistance Program Guidelines, fulfillment of staffing needs, and procurement of any Contracting Partner(s), LAHD and/or its designee shall identify a date for the Application Portal to open.

SECTION 5: CONTRACTUAL SERVICES

At its discretion, LAHD may contract some or all of the responsibilities necessary to effectuate these Short-Term Emergency Assistance Guidelines to a third party program administrator, or Contracting Partner(s). Any procurement activities shall be conducted consistent with the City Administrative Code and relevant City and LAHD policies. Upon completion of any existing contract term, the Program Administrator may consider extending the term of that contract consistent with the terms of the existing agreement or conducting a competitive bid for Short-Term Emergency Assistance Program services, consistent with the City's competitive bidding requirements.

5.1 Evaluation and Selection Process

Should LAHD contract responsibilities to a third party, award of any contract for Short-Term Emergency Assistance Program services shall be based on a best value competitive bid. Prior to release of a Request for Proposals (RFP), LAHD shall establish a scoring system assigning values to the following criteria, and rating responses to proposals accordingly:

- 1) Experience and approach to providing services set forth in *Sections 2.3* and *3.1* of these Protections from Short-Term Emergency Assistance Program Guidelines.
- 2) Experience with and approach to providing services to the communities anticipated to be most at risk of displacement due to Economic Hardship.
- 3) A cost proposal for solicited services.

The COC may consider recommending an integrated RFP process that allows service providers to bid for multiple Homelessness Prevention Programs under the same ULA-funded contract.

5.2 City Living Wage Ordinance

All contractors shall comply with the Living Wage Ordinance, Los Angeles Administrative Code Section 10.37 et seq., as amended from time to time. Contractors further shall agree to comply with federal law proscribing retaliation for union organizing. Any subcontract entered into by a contractor for work to be performed under these Program Guidelines must include an identical provision.

5.3 Data Collection and Reporting

Consistent with *Section 4* of the Introduction to these Short-Term Emergency Assistance Program Guidelines, information regarding the number of applications filed (and approved) in the Short-Term Emergency Assistance Program portal, the amount of funding disbursed subject to approved applications, and other related metrics shall be compiled and provided to the COC within ninety (90) days after the closure of an Application Period.

Should the program at any time accept Applications on a rolling basis, the information identified in this *Section 5.3* shall be compiled and provided every ninety (90) days during pendency of that rolling Application Period, and within ninety (90) days after the closure of that rolling Application Period.

This information includes, but is not limited to:

- Number of displacements and evictions.
- Number of Unlawful Detainer filings.
- Number of applications filed in the Short-Term Emergency Assistance Program portal.
- Number of applications for Short-Term Emergency Assistance Program funding approved.
- Number of applications for Short-Term Emergency Assistance Program funding that did not receive funding.
- Average household income of approved applications for Short-Term Emergency Assistance Program funding.
- Amount of funding and duration of assistance requested.
- Housing status for set periods following receipt of Short-Term Emergency Assistance funds.