



Clark County and City of Vancouver Tenant-Based Rental Assistance (TBRA) Question and Answer

Updated: October 10, 2025 (New or updated questions are indicated in red)

Clark County and City of Vancouver staff have collected technical assistance questions over the years of administering TBRA programs and know how confusing the rules and regulations can be. This document is a resource for housing agencies and funding staff to ensure that all programs receive the same technical assistance. If you do not see an answer to your question, please send your contract's main contact an email and we will work to get a response added. Answers apply to both funding agencies unless otherwise specified.

Questions have been grouped by category. Click these links to jump to a specific section: [Financial](#), [Rental Assistance and Deposits](#), [Case Management and Program Participation](#), [Housing](#), [Utility Allowances](#), [Referrals](#), [Other Requirements](#)

QUESTION		ANSWER
Financial		
1.	What costs can be billed to the HOME portion of the program?	"Rental Subsidies" include: • Rent Utility payments include electric, gas, water and trash services paid to either the landlord or to the utility company • Security deposit grants (no more than two times the monthly rent – paid directly to landlord), • Housing Quality Standards (HQS) inspections* • Tenant income determination/redetermination* HOME funds are restricted and cannot pay for housing case management or other staff and operating costs. Per 24 CFR 92.209(a), HOME funds are unable to pay for other utilities or landlord required fees that are not listed above. *Staff time used for these activities must be separated from other TBRA program staff time reporting.

2.	What costs can be billed to the CDBG portion of the program?	To support the program, the county will allocate up to 30% and the city will allocate up to 35% of the Rent Subsidy/HOME request with Supportive Services/CDBG funds. Eligible expenses for these funds include: • Personnel Costs: salaries and benefits for program staff and program supervision including reporting, data collection and entry. • Operating Costs: allocated office, telephone, training, mileage, supplies, insurance, and other operating costs. • Supportive Services: move-in costs, including security deposit, moving costs, including truck rental and temporary storage fees (up to three months); landlord incentives (up to \$3,000); late fees; costs associated with application fees and background/credit check fees. • Additional costs included in the lease like internet, cable, washer and dryer, and renter's insurance. Although Supportive Services funds are more flexible, the amount of funding is limited and not intended to cover the full costs of the program.
3.	Can arrears be paid with HOME funds?	No.
4.	Can arrears be paid with CDBG funds?	Yes, with conditions. Please reach out to your contract contact for assistance on a case-by-case basis.
5.	Can TBRA funds be used with other rapid rehousing funding?	TBRA Rent Subsidy HOME funds tend to be more restrictive than other funding sources and would require the program to adopt the more restrictive requirements in the contract. Agencies cannot pay a portion of rent with TBRA Rent Subsidy HOME funds and another funding source. TBRA Supportive Services CDBG funds can only be used to support households receiving TBRA Rent Subsidy HOME funds and cannot be used until TBRA Rent Subsidy HOME funds are supporting that household. Other agency funding can be used to support households in meeting their housing stability needs, if those funds are not used for rent or utility assistance.
6.	What is the timeline for spending funds?	The period of performance is typically one year. This may be extended with approval from your funding agency on a case-by-case basis. The County and City typically execute contracts for the following calendar year once the grant agreement is received from HUD.
7.	Since CDBG funds need to be connected to HOME funding, is it okay to accrue staff time and not bill it until the household becomes housed and HOME funding is spent? What if case management happens at the end of one year and HOME funds are used the following year?	The charges for CDBG don't qualify until at least \$1 of HOME funding is spent, so if HOME funding is spent the following calendar year, those CDBG charges would be in partnership with the HOME funds and eligible to bill during the next calendar year. Please notify staff if you are carrying costs from one calendar year to another.

8.	If a household already receives funding from another program, can they also qualify for TBRA?	No, HOME TBRA may not duplicate existing rental assistance programs that already reduce the tenant's rent payment to 30 percent of income.
9.	How should TBRA assistance be calculated when a client's lease includes fees that are ineligible for payment with HOME funds?	If a client's lease includes fees that cannot be paid for with HOME funds (renter's insurance, utility administration fees, washer/dryer, cable, internet, etc), these fees must be excluded from the client's total rent. These costs can be billed to CDBG Supportive Services. For example, if a client's total rent, including a \$100 fee for internet and cable, is \$1,600, then the \$100 for internet and cable would need to be subtracted when calculating TBRA assistance. When stating the client's total rent for FMR calculation and in the CPD calculator to determine client and agency subsidy, the cost of rent would be considered \$1,500.

QUESTION		ANSWER
Rental Assistance and Deposits		
1.	Do security deposits get returned to the tenant or the housing agency?	If the tenant is exiting the program, the deposit should be returned to the tenant.
2.	If a client is moving while still receiving assistance, can the agency use the initial security deposit for the client's next security deposit?	Households should have a demonstrated need for relocating while on a TBRA program. Any returned security deposit from the first unit should be used toward the security deposit on the next unit. If additional security deposit is required to secure the second unit, this is allowable.
3.	For unit transfers/moves, while in program, are agencies able to pay two units for the same month? The participant would not be qualified as homeless while moving units.	The household's housing status needs to be qualified as homeless at time of entry. If the household moves during their time in TBRA, they would not need to requalify as homeless. The TBRA program is unable to pay for two units for a single household. The days within the month must be prorated for when the household was living there. For example, if the household moved out on the 14 th , TBRA could provide payment at unit 1 for 14 days and payment for unit 2 for the remainder of the month.
4.	Can agencies require households that are not paying their portion of rent to sign notices each month that acknowledges their portion of the rent?	Agencies should not require only delinquent households to sign a notice, as this would be unequal and potentially stigmatizing. Tenants can be notified that they are responsible for their rent portion, and that failure to pay may result in late fees or a Nonpayment of Rent/Vacate Notice. Notices should be clear, consistent, and accessible to all households when applicable.
5.	Does the client have to pay their portion of the rent prior to the agency paying?	Ideally, both rent portions would be paid at the same time, but agencies can pay at any time.

6.	How much can be spent on security deposits per household?	The maximum amount of HOME funds that may be provided for the security deposit is the equivalent of two months' rent for the unit. Anything more needs to be paid with CDBG funds with approval from County/City staff.
7.	How much can be spent on utility deposits per household?	Utility deposit assistance must be provided in conjunction with a TBRA security deposit or monthly assistance program. In addition, utility deposit assistance may be used only for utilities permitted under the Section 8 utility allowance. This includes electric, gas, water and trash, but does not include telephone and cable television.
8.	If a lease requires payments for services such as cable, internet, parking, or other fees, how do we treat those costs?	If a lease requires a monthly payment from a household paid to the landlord or a third party, like internet, cable, renter's insurance, washer/dryer fees, etc, CDBG funds can be used to pay for these charges.
9.	If a client accepted into the RRH program voluntarily enters inpatient treatment before being housed, can agencies continue to assist them with housing search and pay deposits or rent? If so, how long can rent be paid?	Agencies may continue to support the client in searching for housing and may pay deposits to hold a unit if appropriate. However, rental assistance should generally begin only once the tenant moves into the unit. If deposits or rent are paid before move-in and the tenant ultimately does not move in (for example, due to an extended stay in treatment or a change in circumstances), the agency may be required to repay the rental assistance and potentially the related staffing costs. Agencies should exercise caution and document the situation carefully.

QUESTION		ANSWER
Case Management and Program Participation		
1.	Is the requirement for voluntary services a federal provision?	Yes. If a household is not participating in housing stability planning, contact county/city staff. Examples of services which can only be offered on a voluntary basis include participating in employment search activities, credit repair classes, etc.
2.	Can a household be terminated from the program if they are not participating in case management?	The HOME program allows agencies to require participation in self-sufficiency activities, including case management, as a condition of program entry. However, once a household has been admitted into the HOME TBRA program, rental assistance cannot be terminated for failure to continue participating in those activities. Agencies may set policies such as conducting more frequent recertifications, but they may not deny or discontinue assistance based solely on a household's decision to stop engaging in case management or other self-sufficiency services after admission.
3.	Can a household be terminated from the program if they do not provide recertification documents?	The HOME program requires income certification at least annually, or more frequently if stated in the housing agency's policies. If a household does not provide the required documentation for the recertification process, assistance cannot be provided.

4.	Can a client receive TBRA assistance beyond 24 months?	Per 24 CFR 92.209(e)(2), “the term of the rental assistance contract providing assistance with HOME funds may not exceed 24 months, but the rental assistance contract may be amended or renewed, subject to the availability of HOME funds.” This allows housing providers discretion to make exceptions to the 24-month limit of the TBRA program. Any extensions must be clearly documented in the participant’s file, including the rationale for the exception and factors considered. Housing providers should also include their extension parameters and approval process in their policies and procedures.
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QUESTION		ANSWER
Housing		
1.	Can rental assistance be used for a transitional group home?	Tenant-based Rental Assistance (TBRA) must allow the tenant to choose their housing unit. Project-based Rental Assistance is not eligible for funding. Agencies may not provide HOME TBRA to households for overnight or temporary shelter.
2.	Can a household be moved from another rapid re-housing program into TBRA?	In most cases, no. In rare circumstances, a household can be moved from another rapid re-housing program into TBRA, however, all program requirements must be met including review of the existing lease for TBRA compliance, the Lease Addendum must be added to the lease, the TBRA Coupon and Rental Assistance Contracts must be executed, and an HQS inspection must be completed. Housing providers are responsible for ensuring that all requirements are met before spending HOME funds. When transferring a household between rental assistance programs, contact the city or county to discuss.
3.	Can assistance be used for sober living housing?	In most situations, no. TBRA requires a one-year lease and eviction cannot be conditioned on sobriety.
4.	Can agencies use TBRA for households living in their agency-owned housing?	Only if the tenant chooses this unit as the best fit for their household. Additional documentation should be included in the file that documents that the tenant was aware they could live in any unit in Clark County and chose the agency’s unit.

QUESTION		ANSWER
Utility Allowances		
1.	What does “Other Specify: Electric Charge” and “Other Specify: Natural Gas Charge” cover on the Utility Allowance form? When is it included?	The “Other Specify: Electric Charge” and the “Other Specify: Natural Gas Charge” refer to additional monthly charges that may appear on utility bills such as administrative fees. If the tenant is responsible for paying either of these utilities, the corresponding “Other Specify” charge should be included in the allowance calculation.
2.	What about “Other Electric”? What does this cover and when do I include it in the allowance calculation?	The “Other Electric” category refers to general electric charges that aren’t for Heating, Cooking, or Water Heating. For example, lighting and plug-ins would fall under this category. All tenants who are responsible for paying electricity should have the “Other Electric” allowance included as part of the Utility Allowance calculation.
3.	How should the utility allowance be determined if utilities are paid in a set amount stated by the lease?	If the utility payment stated in the lease is flat fee (e.g. \$60 for water/sewer/gas per month), then these utilities are considered part of the client’s rent and will not be calculated using the utility allowance form. Any utilities not accounted for in the flat fee (e.g. electricity) should be calculated based on the utility allowance form. If the utility payment is stated in the lease but is based on a formula or is any amount that does not remain static, utility assistance will be calculated using the utility allowance form. If you encounter a case where you are uncertain about the amount of assistance a client should be provided, please reach out to your city or county program coordinator for assistance.

QUESTION		ANSWER
Referrals		
1.	We would like to use TBRA funds for our current clientele. Do we have to take referrals from the Housing Solutions Center?	Yes, at this time, TBRA contracts must only take referrals from the Housing Solutions Center (HSC). If you work with people who are experiencing homelessness and in a specific subpopulation, you can request that the HSC only refer this subpopulation to your agency for TBRA with prior funder approval. However, rental assistance may not be conditioned upon program participation and the tenant may or may not engage in your other programs. Exceptions are allowed for programs serving special populations that are excluded from using coordinated entry, such as survivors of domestic violence.

2.	Do all households have to come from a place not meant for human habitation?	Every 4 th referral must come from a shelter. Council for the Homeless' referral portal will track which referrals come from a shelter. All other referrals must meet the definition of homelessness.
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QUESTION		ANSWER
Other Requirements		
1.	How do I check if a property is in a floodplain?	• Use the FEMA Flood Map Service Center located at https://msc.fema.gov/portal/home ○ Enter the address of the property: ○ Click Search ○ Generate FIRMette ▪ Click on Dynamic Map to download the floodplain map ▪ Review the legend to see whether a property is located within a floodplain
2.	If a property is within a floodplain, is flood insurance required?	No. If a property is within a floodplain, notify the tenant of their rights for flood insurance.
3.	Who is responsible for completing the HQS inspection?	• City: HQS inspections may be completed by city staff. To request an inspection, agency will send HQS Inspection Request form (provided by the city) via email to the Housing Rehab Specialist. For the 12-month inspection, agency will complete the HQS form and keep document in client's file. Under no circumstances will an agency be allowed to complete the inspection if it owns the unit. • County: The housing agency is responsible for completing the HQS inspection.
4.	When will NSPIRE inspections be required in place of HQS?	HUD has delayed implementation of the new NSPIRE inspections until October 2026. Training will be provided before the new requirement is enacted.
5.	What is the length of time for recordkeeping?	Agencies should keep records for 5 years after assistance ends.
6.	Where can I find helpful resources for Washington laws that support tenants?	Visit Washington Law Help to find tenant laws in a downloadable format.