



OFFICE OF
INSPECTOR GENERAL

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

OIG-CA-25-056
August 25, 2025

Emergency Rental Assistance (ERA1) Program Notice of Recoupment – State of Florida

Summary

The ERA1 statute (Division N, Title V, Subtitle A, § 501, of the Consolidated Appropriations Act, 2021 (Pub. L. No. 116-260), Dec. 27, 2020, and codified at 15 USC § 9058a) directs the Department of the Treasury (Treasury) to make allocations and payments to eligible grantees such as States and local governments, who in-turn, make funding available in the form of rental assistance to eligible households. The statute also directs the Treasury Office of Inspector General (OIG) to conduct monitoring and oversight of the receipt, disbursement, and use of funds made available to grantees. As part of this oversight authority, if OIG determines that a grantee failed to comply with the use of funds requirements in the statute, the amount equal to the amount of funds used in violation shall be booked as a debt of such entity owed to the Federal Government.

The State of Florida is a recipient of funds under the ERA1 statute. Beginning February 2023 through January 2024, we made inquiries to the State of Florida regarding 12 complaints of suspected fraud related to its ERA1 award reported to the OIG hotline. Based on the information provided, we determined that the State of Florida's ERA1 program paid out ERA1 funds totaling \$98,610 in violation of the ERA1 statute because the funds were disbursed to ineligible households. On August 20, 2025, Treasury's Bureau of the Fiscal Service issued an invoice for \$98,610 to State of Florida establishing a debt to the Federal Government.

The following document is OIG's Notice of Recoupment (Notice) that established this debt. The State of Florida was given an opportunity to provide a written response to a draft of the Notice and its written response and our evaluation of that response is also included in the Notice.

We conducted our review of this ERA case from February 2023 to August 2025. We inquired of the grantee and other relevant parties, reviewed related documentation, and performed other appropriate procedures. We believe the evidence obtained is sufficient and appropriate to provide a reasonable basis for our determination in this Notice.

In conducting our review, we followed the OIG's system of quality management for ensuring that the information in this report is accurate. We also followed the Council of the Inspectors General on Integrity and Efficiency (CIGIE) *Quality Standards for Federal Offices of Inspector General* which require that our work adheres to its general standards for integrity to include objectivity, independence, professional judgment, and confidentiality as well as its general standard for receiving and reviewing allegations.

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State of Florida



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WASHINGTON, D.C. 20220

Notice of Recoupment

Emergency Rental Assistance

Division N, Title V, Subtitle A, § 501 of the Consolidated Appropriations Act, 2021
(Pub. L. No. 116-260), Dec. 27, 2020, and codified at 15 USC § 9058a (ERA1)

August 18, 2025

Grantee: State of Florida

Points of Contact: Bridget Royster, Assistant Secretary
Florida Department of Children and Families

(b) (6)

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Mailing Address: 200 E Gaines St, Tallahassee, FL 32399

Federal Award Identification Number: ERA0349

Proposed Recoupment Amount: \$98,610.00

Background/Legal Authority

Under the ERA1 statute at 15 U.S.C. § 9058a(c), Use of Funds, an eligible grantee shall only use ERA1 award funds to provide financial assistance and housing stability services to eligible households. The financial assistance includes: the payment of rent; rent arrears; utilities and home energy costs; utilities and home energy costs arrears; and other expenses related to housing incurred due, directly or indirectly, to the COVID-19 outbreak, as defined by the Secretary of the Department of the Treasury (Treasury). Such assistance shall be provided for a period not to exceed 12 months except that grantees may provide assistance for an additional 3 months to ensure housing stability (subject to availability of funds). The ERA1 statute at 15 U.S.C. § 9058a(c)(2)(B)(i) allows for up to 3 months (with exceptions) for prospective rent payments within the 12 or 15 month total assistance limitation.

The ERA1 statute at 15 U.S.C. § 9058a(k)(3)(A) defines eligible household as a household of 1 or more individuals who are obligated to pay rent on a residential

dwelling and with respect to which the eligible grantee involved determines: (1) that one or more individuals within the household has (a) qualified for unemployment benefits or (b) experienced a reduction in household income, incurred significant costs, or experienced other financial hardship due, directly or indirectly, to the COVID-19 outbreak, which the applicant shall attest in writing; (2) that one or more individuals within the household can demonstrate a risk of experiencing homelessness or housing instability, which may include (a) a past due utility or rent notice or eviction notice; (b) unsafe or unhealthy living conditions; or (c) any other evidence of such risk, as determined by the eligible grantee involved; and (3) the household has a household income that is not more than 80 percent of the area median income for the household. In accordance with the ERA1 statute at 15 U.S.C. § 9058a(k)(3)(B), the grantee must also ensure that, to the extent feasible, any rental assistance provided to an eligible household is not duplicative of any other federally funded rental assistance provided to such household.

Pursuant to the ERA1 statute at 15 U.S.C. § 9058a(e)(2), the last day of the period of performance for grantees that received ERA1 reallocated funds is December 29, 2022.

The ERA1 statute at 15 U.S.C. § 9058a(i), Inspector General Oversight; Recoupment, directed that Treasury's Office of Inspector General (OIG) conduct monitoring and oversight of the receipt, disbursement, and use of funds made available under the ERA1 program. As part of this authority, if OIG determines that a grantee failed to comply with the use of funds requirements in ERA1 statute (15 U.S.C. § 9058a(c)), the amount equal to the amount of funds used in violation of 15 U.S.C. § 9058a(c) shall be booked as a debt of such grantee owed to the Federal Government. Amounts recovered shall be deposited into the general fund of the Treasury.

Facts and Analysis

Beginning February 2023 through January 2024, we made inquiries to the State of Florida (Florida)¹ regarding 12 complaints of suspected fraud related to its ERA1 award program reported to the OIG hotline. Florida had reported 10 of the complaints² and tenants reported the other 2 complaints. Based on Florida's response to our inquiries and documentation provided, we determined that Florida failed to comply with the Use of Funds statute (15 U.S.C. § 9058a(c)) when

¹ These inquiries were directed to the Florida Department of Children and Families (DCF), a state agency tasked to operate the Our Florida Program, Florida's ERA program.

² Although the complainant for the 10 complaints filed them anonymously with the OIG hotline, we determined that the information reported originated from a source within the Our Florida program as the complaints contain detailed information including application data, award details, case summaries, and contact information for a DCF employee who did provide further information.

it paid out ERA1 award funds totaling \$98,610 for 11 of the 12 cases, as described below:³

Florida Reported Complaints

1. For application #FL-(b) (6) Florida paid \$15,000 in rental assistance with ERA1 award funds to a landlord. Subsequent to the payment, Florida determined there were "Invalid Identification Documents in File – Missing Standard ID features." Florida sent a letter to the landlord on July 29, 2022, seeking valid copies of the documents and advising that the funds would be required to be returned for failure to respond. When no response was received, Florida sent the landlord a "Notice of Overpayment and Recoupment" on August 9, 2022, asking for repayment of the \$15,000. As of February 7, 2025, Florida stated that the funds have not been repaid. Florida paid ERA1 assistance based on an application that lacked valid identity documentation to establish eligibility and therefore Florida cannot establish an eligible use of funds. Accordingly, we determined that rental assistance paid, in the amount of \$15,000, is an ineligible ERA1 expenditure that failed to comply with the requirements of the ERA1 statute.
2. For application #FL-(b) (6) Florida paid \$15,000 in rental assistance with ERA1 award funds to a tenant. Subsequent to the payment, Florida determined there were "Invalid Lease/Landlord Documentation in File – Inconsistency between documents, Landlord name does not match application." Florida sent a letter to the tenant on July 29, 2022, seeking valid copies of the documents and advising that the funds would be required to be returned for failure to respond. When no response was received, Florida sent the tenant a "Notice of Overpayment and Recoupment" on August 9, 2022, asking for repayment of \$15,000. As of February 7, 2025, Florida stated that the funds have not been repaid. Florida paid ERA1 assistance based on an application that lacked valid lease/landlord documentation to establish an obligation to pay rent and therefore Florida cannot establish an eligible use of funds. Accordingly, we determined that the rental assistance paid, in the amount of \$15,000, is an ineligible ERA1 expenditure that failed to comply with the requirements of the ERA1 statute.
3. For application #FL-(b) (6) Florida paid \$15,000 in rental assistance with ERA1 award funds to a landlord. Subsequent to the payment, Florida determined there were "Invalid Identification Documents in File – Missing Standard ID features" and "Invalid Lease/Landlord Documentation in File – Inconsistency between documents." Florida sent a letter to the landlord on July 29, 2022, seeking valid copies of the documents and advising funds

³ As discussed in the Grantee Response section of this Notice, we determined that the payment for 1 of the 12 cases was eligible.

would be required to be returned for failure to respond. When no response was received, Florida sent the landlord a "Notice of Overpayment and Recoupment" on August 9, 2022, asking for repayment of the \$15,000. As of February 7, 2025, Florida stated that the funds have not been repaid. Florida paid ERA1 assistance on an application that lacked valid identification and lease/landlord documentation to establish an obligation to pay rent and therefore Florida cannot establish an eligible use of funds. Accordingly, we determined that the rental assistance paid, in the amount of \$15,000, is an ineligible ERA1 expenditure that failed to comply with the requirements of the ERA1 statute.

4. For application #FL-(b) (6) Florida paid \$12,040 in rental assistance with ERA1 award funds to a landlord. Subsequent to the payment, Florida determined there were "Invalid Identification Documents in File – Blurry or Illegible" and "Invalid Lease/Landlord Documentation in File – Inconsistency between documents." Florida sent a letter to the landlord on July 29, 2022, seeking valid copies of the documents and advising funds would be required to be returned for failure to respond. When no response was received, Florida sent the landlord a "Notice of Overpayment and Recoupment" on August 9, 2022, asking for repayment of the \$12,040. As of February 7, 2025, Florida stated that the funds have not been repaid. Florida paid ERA1 assistance on an application that lacked valid identification and lease/landlord documentation to establish an obligation to pay rent and therefore Florida cannot establish an eligible use of funds. Accordingly, we determined that the rental assistance paid, in the amount of \$12,040, is an ineligible ERA1 expenditure that failed to comply with the requirements of the ERA1 statute.
5. For application #FL-(b) (6) Florida paid \$11,250 in rental assistance with ERA1 award funds to a landlord. Subsequent to the payment, Florida determined that all or a portion of the payment was invalid due to "Invalid Lease/Landlord Documentation in File – Inconsistency between documents, Landlord name missing, Missing term, Missing two signatures" and "Invalid Household Income Verification in File – Unemployment or public benefits documentation is inactive." Florida sent a letter to the landlord on July 29, 2022, seeking valid copies of the documents and advising funds would be required to be returned for failure to respond. After a response was received, but ultimately denied by Florida, it sent the landlord a "Notice of Overpayment and Recoupment" on August 9, 2022, asking for repayment of the \$11,250. As of February 7, 2025, Florida stated that the funds have not been repaid. Florida paid ERA1 assistance on an application that lacked valid identification and lease/landlord documentation to establish an obligation to pay rent and therefore Florida cannot establish an eligible use of funds. Accordingly, we determined that the rental assistance paid, in the amount of

\$11,250, is an ineligible ERA1 expenditure that failed to comply with the requirements of the ERA1 statute.

6. For application #FL-(b) (6) Florida paid \$9,600 in rental assistance with ERA1 award funds to a landlord. Subsequent to the payment, Florida determined there were "Invalid Lease/Landlord Documentation in File – Inconsistency between documents, Landlord name does not match application." Florida also determined that the landlord on the lease did not own the property address. Florida sent a letter to the landlord on July 29, 2022, seeking valid copies of the documents and advising funds would be required to be returned for failure to respond. When no response was received, Florida sent the landlord a "Notice of Overpayment and Recoupment" on August 9, 2022, asking for repayment of the \$9,600. As of February 7, 2025, Florida stated that the funds have not been repaid. Florida paid ERA1 assistance on an application that lacked valid lease/landlord documentation to establish an obligation to pay rent and therefore Florida cannot establish an eligible use of funds. Accordingly, we determined that the rental assistance paid, in the amount of \$9,600, is an ineligible ERA1 expenditure that failed to comply with the requirements of the ERA1 statute.
7. For application #FL-(b) (6) Florida paid \$7,770 in rental assistance with ERA1 award funds to a tenant. Subsequent to the payment, Florida determined there were "Invalid Lease/Landlord Documentation in file – Inconsistency between documents" and that the landlord's driver's license appeared to be altered. Florida sent a letter to the tenant on October 31, 2022, seeking valid copies of the documents and advising funds would be required to be returned for failure to respond. When no response was received, Florida sent the tenant a "Notice of Overpayment and Recoupment" on November 14, 2022, asking for repayment of the \$7,770. As of February 7, 2025, Florida stated that the funds have not been repaid. Florida paid ERA1 assistance on an application that lacked valid lease/landlord documentation to establish an obligation to pay rent and therefore Florida cannot establish an eligible use of funds. Accordingly, we determined that the rental assistance paid, in the amount of \$7,770, was an ineligible ERA1 expenditure that failed to comply with the requirements of the ERA1 statute.
8. For application #FL-(b) (6) Florida paid \$8,380 in rental assistance with \$5,350 in ERA1 award funds and \$3,030 in ERA2 award funds to a landlord. Subsequent to the payment, Florida determined there were "Invalid Lease/Landlord Documentation in File – Inconsistency between documents." Florida sent a letter to the landlord on July 29, 2022, seeking valid copies of the documents and advising funds would be required to be returned for failure to respond. When no response was received, Florida sent the landlord a "Notice of Overpayment and Recoupment" on August 9, 2022, asking for

repayment of the \$8,380. As of February 7, 2025, Florida stated that the funds have not been repaid. Florida paid ERA1 assistance on an application that lacked valid lease/landlord documentation to establish an obligation to pay rent and therefore Florida cannot establish an eligible use of funds. Accordingly, we determined that the rental assistance paid, in the amount of \$5,350, was an ineligible ERA1 expenditure that failed to comply with the requirements of the ERA1 statute.

9. For application # FL-(b) (6) Florida paid \$1,000 in rental assistance with ERA1 award funds to a tenant. Subsequent to the payment, Florida determined there were "Invalid Identification Documents in File – Blurry or Illegible" and "Invalid Lease/Landlord Documentation in File – Inconsistency between documents, Landlord name does not match application." Florida sent a letter to the tenant on November 4, 2022, seeking valid copies of the documents and advising funds would be required to be returned for failure to respond. When no response was received, Florida sent the tenant a "Notice of Overpayment and Recoupment" on November 18, 2022, asking for repayment of the \$1,000. As of February 7, 2025, Florida stated that the funds have not been repaid. Florida paid ERA1 assistance on an application that lacked valid lease/landlord documentation to establish an obligation to pay rent and therefore Florida cannot establish an eligible use of funds. Accordingly, we determined that the rental assistance paid, in the amount of \$1,000, was an ineligible ERA1 expenditure that failed to comply with the requirements of the ERA1 statute.

Tenant Reported Complaints

10. For application # FL-(b) (6), Florida paid \$7,500 in rental assistance with \$3,750 in ERA1 award funds and \$3,750 in ERA2 award funds to a landlord. Florida responded to our inquiry that it had previously determined there were "Invalid Lease/Landlord Documentation in File – Inconsistency between documents." Florida sent a letter to the landlord on July 29, 2022, seeking valid copies of the documents and advising funds would be required to be returned for failure to respond. When no response was received, Florida sent the landlord a "Notice of Overpayment and Recoupment" on August 9, 2022, asking for repayment of the \$7,500. As of February 7, 2025, Florida stated that the funds have not been repaid. Florida paid ERA1 assistance on an application that lacked valid lease/landlord documentation to establish an obligation to pay rent and therefore Florida cannot establish an eligible use of funds. Accordingly, we determined that the rental assistance paid, in the

amount of \$3,750, was an ineligible ERA1 expenditure that failed to comply with the requirements of the ERA1 statute.⁴

11. For application #FL(b) (6), Florida paid \$8,686 in rental assistance with \$2,850 in ERA1 award funds and \$5,836 in ERA2 award funds to a landlord. Florida responded to our inquiry that it had previously determined that rental assistance was incorrectly paid to the wrong landlord. As a result, Florida sent the payee a "Notice of Overpayment" on May 6, 2022, June 5, 2022 and July 5, 2022, seeking repayment of the \$8,686. As of February 7, 2025, Florida stated that the funds have not been repaid. Accordingly, we determined that the rental assistance paid, in the amount of \$2,850, is an ineligible ERA1 expenditure that failed to comply with the requirements of the ERA1 statute because the payment was sent to the wrong payee.⁵

These 11 cases are summarized as follows:

Case	State of Florida Application No.	Ineligible ERA1 Financial Assistance Payments
Florida Reported Complaints		
1	FL-(b) (6)	\$15,000.00
2	FL-(b) (6)	15,000.00
3	FL-(b) (6)	15,000.00
4	FL-(b) (6)	12,040.00
5	FL-(b) (6)	11,250.00
6	FL-(b) (6)	9,600.00
7	FL-(b) (6)	7,770.00
8	FL-(b) (6)	5,350.00
9	FL-(b) (6)	1,000.00
Tenant Reported Complaints		
10	FL-(b) (6)	3,750.00
11	FL-(b) (6)	2,850.00
Total		\$98,610.00

Based on the information provided, we determined that Florida failed to comply with the use of funds requirement in the ERA1 statute (15 U.S.C. § 9058a(c)) when it paid out ERA1 award funds totaling \$98,610 to ineligible households. Accordingly, these funds are required to be returned to the Federal Government.

Grantee Response

We provided Florida an opportunity to respond to our Proposed Notice of Recoupment. On May 23, 2025, the Assistant Secretary, Office of Economic Self

⁴ We issued a draft Questioned Cost Finding for the payment of ERA2 award funds, in the amount of \$3,750, that we determined was ineligible under the ERA2 statute at 15 U.S.C. § 9058c(d), Use of Funds.

⁵ We issued a draft Questioned Cost Finding for the ERA2 award funds, in the amount of \$5,836, that we determined was ineligible under the ERA2 statute at 15 U.S.C. § 9058c(d), Use of Funds.

Sufficiency, Florida Department of Children and Families, provided its written response by email, which is included verbatim as follows:

The Emergency Rental Assistance (ERA) program was originally authorized under the Consolidated Appropriations Act of 2021 and continued under The American Rescue Plan of 2021.

In the state of Florida, the Florida Department of Children and Families (Department) oversaw the statewide ERA program and was successful in providing more than \$1.4 billion in ERA benefits to Floridians through implementation and completion of the program in September 2022.

During the rollout and implementation of ERA during the Biden Administration, the program was operated through federal regulation and “Frequently Asked Questions” that evolved throughout the program and lacked important specificities, and provided inadequate requirements that did not consider the overall integrity of the program. Specifically, guidance regarding the verification of individual’s eligibility included self-attestations. Communication from federal partners was to obligate and spend the funds as quickly as possible, while under continuous threat of funds being removed if certain benchmarks were not met.

Additionally, the Department hired a vendor to amplify the administration of the program to ensure eligible Floridians who were impacted were able to access the funds. The Department took a methodical approach utilizing federal guidance available at the time to develop requirements, ensure and enforce integrity within the program, and implement additional steps in the eligibility process to rectify the otherwise lax guidance provided by the Biden Administration that did not require landlord participation and relied on self-attestations.

With a proven performance record in Florida of prioritizing both timeliness and integrity, the Department went a step further and developed a multi-step eligibility determination process which included a higher-level quality assurance review process, and an additional post-payment review to monitor and track eligibility determinations. The implementation of both the second-level quality assurance review process prior to the eligibility determination and payment coupled with the post payment review ensured the program upheld the State’s commitment to effective and efficient service delivery and conservative stewardship of taxpayer dollars. Moreover, if at any point in the Department-implemented post-payment review

process it was determined that a payment was made in error, either by the applicant or staff, the process required that attempts be made to recover the funds through recoupment letters.

Florida's quality assurance review process on both the front and back end of the eligibility determination was developed and executed as a leading practice when the program was implemented in 2021. Three years later and after the last ERA payment in the State of Florida was made in September 2022, the U.S. Department of Treasury provided updated guidance in November 2024 stating "Treasury recognizes the unique emergency circumstances in which the ERA programs were implemented and that attempts to recoup non-fraudulent improper payments from ERA beneficiaries could undermine the purpose of the ERA program if collection efforts place tenants at risk of eviction or housing instability..."

Florida has a demonstrated track record of delivery for the people we serve which includes safeguarding taxpayer dollars for the people who need it most. Again, providing efficient service delivery that keeps program integrity at the forefront and demanding government run effectively. Florida far surpassed the provided federal guidelines and developed integrity and recoupment processes that prevented potential errors. However, in these identified 11 applications out of the 224,266 total approved applications (0.004%), and despite utilizing the self-imposed eligibility determination and post-payment review processes, the Department was unable to recoup the identified funds, due to lack of response from recipients. The Department went above and beyond the federal guidance to ensure the safeguarding of funds and made every attempt to recoup funds when identified. Therefore, the state of Florida should not be required to repay funds three years after the conclusion of the program, when every effort was made to recoup the funds.

In its response, Florida also commented that for a specific case involving a payment of \$6,400 included in the draft Notice of Recoupment, its further review found that the application was supported by valid documentation. We reviewed Florida's additional documentation provided at our request and determined that the payment was eligible. Accordingly, we removed that payment from this Notice.

OIG Evaluation

We considered Florida's response in finalizing the Notice of Recoupment. It should be noted that Florida characterized these application payments as "invalid" in its

recapture letters to beneficiaries. Except for one application for \$6,400, Florida's response did not provide any additional evidence to demonstrate that the financial assistance provided for the subject applications was eligible.

In its written response, Florida makes certain references to Treasury's ERA FAQs and guidance that are not contextually accurate or applicable. According to Florida, this guidance "lacked important specificities and provided inadequate requirements that did not consider the overall integrity of the program. Specifically, guidance regarding the verification of individual's eligibility included self-attestations." The implication here is that Treasury's FAQs did not provide adequate instructions on how grantees were to establish eligibility using self-attestations. We reject this implication.

In FAQ1, Treasury states that "grantees may be flexible as to the particular form of documentation they require to determine eligibility, including by permitting photocopies or digital photographs of documents, e-mails, or attestations from employers, landlords, caseworkers, or others with knowledge of the household's circumstances." Treasury also directs grantees "must require all applications for assistance to include an attestation from the applicant that all the information included is correct and complete." In short, this FAQ provides specific instructions that requires eligibility to be documented, with attestations as to the veracity of the information provided. We do note that FAQ1 permits grantees to rely on self-attestations alone for the provision of housing stability services.⁶ Also, Treasury's FAQ4 does provide for grantees to rely on written self-attestations of a household's income if the household is unable to provide income documentation; however, Treasury directs in this situation that the grantee must reassess the household's income every 3 months, by obtaining appropriate documentation or a

⁶ According to Treasury's FAQ1: "When housing stability services represent the only ERA1 assistance a household will receive (i.e., no payments using ERA1 funds will be made either to the household, to the landlord, or to a utility provider), grantees are encouraged to rely on a household's self-attestations for purposes of confirming eligibility."

new self-attestation. These FAQs explicitly state the requirements when using self-attestations to establish eligibility.⁷

Despite Treasury's self-attestation requirements, Florida determined these applications were invalid based on the applicants' inadequate identification and/or lease/landlord documentation, not self-attestations for eligibility. For example, these included missing signatures, inconsistencies between documents, and manipulated identification documents.

Florida also asserts that per Treasury guidance "attempts to recoup non-fraudulent improper payments from ERA beneficiaries could undermine the purpose of the ERA program if collection efforts place tenants at risk of eviction or housing instability." This statement is from Treasury's ERA FAQ49. While accurate, it has no bearing on Florida's obligation to return ineligible payments to the Federal Government. As Treasury's ERA FAQ49 also states "... grantees are responsible for improper payments made with ERA funds, including those that were not the result of fraud or deliberate misrepresentations ..."

Based on our evaluation of Florida's response to OIG's Draft Notice of Recoupment, Florida has not provided sufficient evidence to demonstrate that the financial assistance provided for the subject applications were for eligible households. In accordance with ERA1 statute and Treasury program guidance, \$98,610 are required to be returned to the Federal Government.

⁷ In its response, Florida also commented that, among other things, guidance which it characterized as lax did not require landlord participation in the program. While this point is not germane to the facts of the 11 cases as that are the subject of this Notice (the payments were made to the landlord for 8 cases and the tenant for 3 cases), we note that the ERA1 law at 15 USC § 9058a(c)(2)(C)(i) did not require landlord participation. This citation states:

With respect to financial assistance for rent and rental arrears and utilities and home energy costs and utility and home energy costs arrears provided to an eligible household from a payment made under this section, an eligible grantee shall make payments to a lessor or utility provider on behalf of the eligible household, except that, if the lessor or utility provider does not agree to accept such payment from the grantee after outreach to the lessor or utility provider by the grantee, the grantee may make such payments directly to the eligible household for the purpose of making payments to the lessor or utility provider.