

# Canada Emergency Commercial Rent Assistance (CECRA) Frequently Asked Questions - Archive

\* PLEASE NOTE: The CECRA program has now closed.

#### 1. What is the Canada Emergency Commercial Rent Assistance (CECRA)?

On April 16, 2020, Prime Minister Trudeau announced a new rent assistance program aimed at those with commercial properties for the months of April to September. This program will be provided through Canada Mortgage and Housing Corporation (CMHC), MCAP and FTC to offer a forgivable loan to voluntary eligible landlords with eligible tenants to reduce rent for their tenant and meet the operating expenses on their commercial property. This forgivable loan will lower rent by 75% for eligible small businesses that have been impacted by COVID-19 and will prevent them from being evicted. September was announced as the last extension of the CECRA.

Applications for April, May, and June are now CLOSED.

Applications for approved CECRA applicants to extend the support for tenants are due October 30th.

<u>Government</u> has announced that going forward, the <u>Canada Emergency Rent Subsidy</u> will support businesses with their rent and mortgage support until June 2021.

#### 2. What is new with the Canada Emergency Commercial Rent Assistance (CECRA)?

Date	CECRA Updates
2020-10- 30	Applications for approved CECRA applicants to extend the CECRA support for tenants for the months of June, July and September are due October 30th.
2020-09- 30	Applications for April, May, and June are now closed
2020-09-	Application period for new applications is extended until September 30, 2020.  Application period for July and August extended, deadline for extensions is October 31, 2020.

Date	CECRA Updates
2020-09- 08	CECRA will be extended into September. This will be the last CECRA extension. Businesses that qualified for April, May, and June will qualify for September.
2020-08- 17	CMHC opened the August extension opt-in for the CECRA program.
2020-07- 31	CECRA will be extended into August. Businesses that qualified for April, May, and June will qualify for August.
2020-07- 13	July extension opt-in for the CECRA program opens.
2020-06- 30	Government removes the requirement to claw-back insurance and provincial rent support from the CECRA forgivable loan amount to simplify the application process.
2020-06- 04	Requirement that tenants provide their 2019 gross revenue to their landlord for the CECRA application removed.
2020-05- 25	CECRA opens for applications
2020-04- 16	The Prime Minister announces a program to help small businesses owners with their rent

#### 3. When will the funds from the Canada Emergency Commercial Rent Assistance (CECRA) be made available?

Once an application is submitted it must be adjudicated. A complete and simple application (i.e. there are no subtenants) can be adjudicated at fastest in about one hour. Applications that are not straight forwards can take longer than 2 weeks to approve. For this reason it is important to ensure your application is complete. Incomplete applications require more time to process, and more touchpoints with the application's parties. Once the application has been approved for funding by MCAP, they notify CMHC twice a week for CMHC to provide the funding in 5-7 business days.

For Quebec applicants, CMHC will be providing you with the 12.5% that the provincial government covered. This 12.5% will be covered in any extensions that you opted into as well.

#### 4. How will the Canada Emergency Commercial Rent Assistance (CECRA) be administered and distributed?

The CMHC has engaged MCAP and First Canadian Title (FCT) to deliver CECRA. You may be contacted by these organizations throughout the validation & funding process. Funds will be transferred to the property owner's financial institution.

### 5. Who is an eligible Landlord/Property owner under the Canada Emergency Commercial Rent Assistance (CECRA)?

Landlords/Property owners who own commercial property with small business tenants that:

- Own commercial property located in Canada; and
- Are renting to one or more COVID-19 impacted small business tenants who are:
  - o Eligible small business tenants; or
  - o Eligible small business subtenants; or
  - Eligible mixed usage tenants (residential components and multi-unit residential properties with commercial tenants); and
- Have entered or will enter into a rent reduction agreement & include a moratorium on eviction for the period of April, May, and/or June 2020 which will reduce the impacted tenant's rent by at least 75%; and
- Have declared rental income on their income tax return (personal or corporate) for the tax years of 2018 and/or 2019; and
- Are the registered owner and landlord of the commercial property with small business tenants.

#### 6. What if I am a Property Owner/Landlord who does not have a mortgage?

Canada Emergency Commercial Rent Assistance (CECRA) is available to eligible property owners/landlords who do not have a mortgage.

# 7. What if I am a Property Owner/Landlord who did not declare rental income in previous years because my property is new?

A newly purchased or constructed property will still be considered eligible for the CECRA if all other program eligibility requirements are met. This includes having entered into a lease agreement with an eligible tenant on or before April 1, 2020.

# 8. Who is an impacted small business tenant or subtenant under the Canada Emergency Commercial Rent Assistance (CECRA)?

Eligible businesses, non-profits and charitable organizations who:

- Pay \$50,000/month or less in rent;
- Generate no more than \$20million in gross annual revenues, calculated on a consolidated basis; and
- Have temporarily ceased operations or
- have experienced a minimum of 70% drop in pre-COVID-19 revenues

# 9. Should I include CEBA, CERB, CEWS in my gross revenue calculation for the Canada Emergency Commercial Rent Assistance (CECRA)?

No, these programs are not to be included in your business's gross revenue calculation.

# 10. What is pre-COVID-19 revenues for the Canada Emergency Commercial Rent Assistance (CECRA)? What is the 70% revenue drop test?

If your business was operating between April-June 2019: compare your gross revenues from April, May and June 2020 to your gross revenues from April, May and June of 2019.

If your business was not operating between April-June 2019: compare your gross revenues from April, May and June 2020 to your gross revenues from January and February 2020.

### 11. How can I apply for an extension to the Canada Emergency Commercial Rent Assistance (CECRA)?

Applications for the September extension are now available to property owners/landlords. Tenants should speak with their landlords if they wish to access the July, August and September extensions. Property owners (landlords) must log into the portal and opt-in for their impacted tenants. If you have previously been approved for CECRA, you will still have to opt-into the extensions for each impacted tenant. No additional documentation or adjudication will be required.

If you haven't yet applied for CECRA, you can apply for July, August and September as part of your entire application. The deadline for new applications is September 30, 2020. Applications for the September extension are due October 30, 2020.

# 12. What are the Canada Emergency Commercial Rent Assistance (CECRA) application requirements?

- Property address and any information pertaining to the program criteria, such as information on the Borrower/Landlord, number of tenants, rent rolls, etc.
- Signed tenant and property owner attestations
- Agreeing to comply with the program's terms and conditions

Canada Mortgage and Housing Corporation (CMHC) reserves the right to request any additional reporting it deems reasonably necessary.

# 13. Can property taxes be included in the rent to be paid to the landlord to add into the Canada Emergency Commercial Rent Assistance (CECRA) application?

If they are stated to be owed to the landlord in a valid lease agreement, property taxes can be included in the expenses to be covered by CECRA.

#### 14. What can I use Canada Emergency Commercial Rent Assistance (CECRA) funds for?

CECRA funds must first and foremost reimburse the tenant for any rents paid over 25% of the monthly rent from April, May and June. Otherwise CECRA funds can be used for the following:

- 1. Net rent / minimum rent / base rent (in a net lease)
- 2. Regular monthly installments of operating costs (in a net lease)
- 3. Regular monthly installments of property taxes payable to the landlord (in a net lease)
- 4. Regular monthly installments of other additional rent amounts payable to the landlord for example: maintenance costs, repairs, utilities, management fees, etc. (in a net lease)
- 5. Gross rent (in a gross lease)
- 6. Percentage of sales rent paid (if included in the lease arrangement)

#### CECRA funds cannot be used for the following:

- 1. Property Damages
- 2. Indemnity payments
- 3. Payments arising due to tenant default / landlord enforcement
- 4. Payments arising due to landlord exercise of self-help remedies
- 5. Interest and penalties on unpaid amounts
- 6. Fees payable for discrete items or special services (for example: fees to landlord for reviewing plans, supervising work, considering requests for consent, performing exceptional tasks at tenant's request)
- 7. Reconciliation adjustment payments
- 8. Amounts required under the lease agreement to be paid separately by the tenant to 3rd parties (for example: property taxes, utilities, insurers)
- 9. Costs of non-monetary obligations (e.g., repairs and maintenance)

Note: applying for insurance coverage does not make you ineligible for the program.

#### 15. When can I apply for the Canada Emergency Commercial Rent Assistance (CECRA)?

Applications for the CECRA are now open to property owners and landlords. Click here to apply. The deadline to apply for the program is September 30, 2020.

If you have already submitted an application, the deadline to apply for the July, August and September extensions is also October 30, 2020.

#### 16. What if a tenant or property owner cannot use e-signatures?

You can sign the documents and use scanned copies in the CECRA application.

# 17. Should I include CEBA in the Canada Emergency Commercial Rent Assistance (CECRA) application where it asks for "Total Property Owner proceeds from insurance or other non-repayable rental support program (if applicable)"?

CMHC considers CEBA to be a repayable loan and therefore it should not be included in this section of the application.

The support from Federal Canada's COVID-19 economic response plan programs do not belong in this section. This section should only include business interruption insurance and/or other non-repayable commercial rent relief programs.

This section will no longer reduce funding from the CECRA forgivable loan, per the government announcement made June 30.

### 18. How can I apply for the Canada Emergency Commercial Rent Assistance (CECRA)? What is the application process?

Landlords will need to provide in their application to CMHC:

- 1. Tenant or Sub-tenant's Attestations
- 2. Property Owner's Attestation
- 3. The signed Rent reduction Agreement (sample)
- 4. The signed Forgivable Loan Agreement (sample)
- 5. Property information: address, type, property tax statement, latest rent roll for each property and the number of commercial units
- 6. Property owner information: banking information (including bank statements), property owner contact information, business ownership details and any co-ownership information and contact details
- 7. Tenant information: contact information, registered business name, lease area, and average monthly gross rent from April to June 2020

# 19. What are the compliance/enforcement procedures or penalties for the Canada Emergency Commercial Rent Assistance (CECRA)?

CMHC has mentioned that property owners will not be on the hook for the forgivable loan should their tenant have misrepresented their gross revenues. Tenant consequences will be determined on a case-by-case basis.

#### 20. What if I already paid my April and May rent?

The agreement is to be retroactive to April 1, covering rent payments for April, May and June 2020. If you already paid your rent, the property owner can offer a rebate or a credit on future rent payments. If a property owner has already provided a discount for April that will count towards the program.

## 21. My lease is up for renewal, will that prevent me from accessing the Canada Emergency Commercial Rent Assistance (CECRA)?

The renewal of a lease will not render a landlord or tenant ineligible for CECRA, providing all the terms and conditions of the program are kept.

### 22. How should I approach my landlord for the Canada Emergency Commercial Rent Assistance (CECRA)?

Every situation is different, but the most important first step is to start the conversation with your landlord. Remember it is in everyone's best interest to work an agreement out. Below are some tips to be considered to facilitate process:

- Communicate your situation with your landlord. Feel free to try using CFIB's CECRA letter template to open a dialogue. You may want to include in the letter what other government programs, if any, you are eligible for.
- Think of other fair options that you might be able to put forwards to your landlord before speaking with them.
- Remind your landlord of your past good tenant history. This may make them less likely to want to start the 6 to 18-month search for a new tenant or risk having to rent their space at a lower pandemic price due to a lack of demand.
- Even if the landlord does not want to agree to CECRA, they may be open to other arrangements. Approach your landlord the same way that you would want any of your customers to approach you if they could not pay and had an outstanding bill.

# 23. My landlord has said they won't apply for the Canada Emergency Commercial Rent Assistance (CECRA), what can I do?

CECRA is not mandatory. You might consider:

- Contacting other tenants in your complex (if applicable) to appeal with a unified voice.
- Some provinces have one-time grants that might help with rent.
- Contacting your provincial government & local MP with a letter
- Sharing your situation with CFIB at cfib@cfib.ca or our BR help line at 1-888-234-2232

# 24. How should I approach my tenant for the Canada Emergency Commercial Rent Assistance (CECRA)?

Every situation is different, but the most important first step is to start the conversation with your tenant. Below are some tips to be considered to facilitate process:

- Provide communications to your tenants that, should they be suffering due to COVID-19, that they should be reaching out to you. Not all tenants will be aware of:
  - o CECRA
  - o Your willingness to participate in CECRA
- Use CFIB's CECRA template letter, bearing in mind that every situation is different.
- Many businesses have lost significant revenue and do not always have access to other programs. If CECRA is not a good fit, then maybe think of another fair option to put forward. Please feel free to use CFIB's letter template to open a dialogue

# 25. Can essential businesses receive the Canada Emergency Commercial Rent Assistance (CECRA)? Does the business have to be closed?

A business is eligible if they have temporarily ceased operation due to COVID-19, OR have experienced at least a 70% drop in pre-COVID revenues

# 26. I have multiple locations – does the Canada Emergency Commercial Rent Assistance (CECRA) apply to each, or only one?

Each location is eligible if:

- it has a gross rent of no more than \$50,000,
- you have a valid lease agreement for each location, and
- you do not generate more than \$20million in gross revenues annually

# 27. Does the revenue reduction requirement for the Canada Emergency Commercial Rent Assistance (CECRA) also depend on location?

The revenue reduction requirement is entity specific. If your small business has multiple locations, you are required to determine the 70% revenue decrease test at the entity level as per your financial statements - not per property even though the application process is by property.

# 28. Can my landlord require me to renegotiate my contract, sign a lease extension and increase my rent when implementing the Canada Emergency Commercial Rent Assistance (CECRA)?

No. This is not in the spirit of the CECRA Program or legislation. CECRA cannot be used to leverage a future lease extension or increases in rent.

### 29. Are property owner's being charged a fee to apply for the Canada Emergency Commercial Rent Assistance (CECRA)?

No, there is no fee to apply for CECRA. However, the CECRA application process may cost landlords time and resources. CMHC offers application help for landlords that can reduce this cost.

### 30. Can landlords charge administration fees for applying for the Canada Emergency Commercial Rent Assistance (CECRA) on behalf of their tenants?

Per CMHC, landlords should not charge administration fees as it is not in the spirit of the legislation or the CECRA program. Should you be a landlord with concerns about CECRA, CMHC can clarify any questions or concerns you might have.

# 31. Can landlords require me to sign a non-disclosure agreement before discussing Canada Emergency Commercial Rent Assistance (CECRA) with me?

It is not in the requirements of the CECRA program and, per CMHC, it is not in the spirit of the legislation or CECRA program. Should you be a landlord with concerns about CECRA, CMHC can clarify any questions or concerns you might have.

# 32. Can my landlord provide me a different rent reduction agreement document from what CMHC provides?

Yes, they can offer you a different rent reduction agreement, as long as they follow CMHC's required provisions.

# 33. What should I do if my Landlord is trying to strong-arm me into signing things or sending extra financial information for the Canada Emergency Commercial Rent Assistance (CECRA)?

Remember to give your landlord the benefit of the doubt. They are a business too. Keep in mind that having them consider applying for CECRA is already half the battle on your end. This program is still very new and landlords may not yet be caught up with all of the rules. Contact CMHC if your landlord is looking for clarification about the program.

If your landlord is in fact trying to strong arm you, please call our Business Counsellors at 1-888-234-2232.

# 34. My businesses started in March, and I have nothing to compare revenues to – am I eligible for the Canada Emergency Commercial Rent Assistance (CECRA)?

The CECRA program will not be available to businesses that opened on or after March 1, 2020.

### 35. I am the landlord and also the owner of my business – am I eligible for the Canada Emergency Commercial Rent Assistance (CECRA)?

Based on the current eligibility criteria, you would not qualify for CECRA. There must be a lease agreement in place between a landlord and a tenant.

# 36. If the landlord is a corporation and the tenant is another corporation, but both corporations are owned by the same person, are they eligible for the Canada Emergency Commercial Rent Assistance (CECRA)?

Yes, providing:

- there is a lease agreement in place;
- the value of the lease is comparable to market value; and
- all other eligibility requirements are met.

### 37. How will the market value of rent be determined for the Canada Emergency Commercial Rent Assistance (CECRA)?

MCAP is one of Canada's largest independent mortgage finance companies, with the tools to assess if a business' rent is out of the norm. Such discrepancies will be escalated to CMHC for further investigation.

<u>Note</u>: businesses operating in an arm's length situation are less likely to have an issue than those operating at non-arm's length.

38. We are in a mall. Would we qualify for the Canada Emergency Commercial Rent Assistance (CECRA) as we pay less than \$50,000, or would they look at the rent of the entire mall?

The program is based on the amount of rent that each individual business tenant pays; so, in this case, you should qualify for CECRA.

39. I am related to my landlord – would I still qualify for the Canada Emergency Commercial Rent Assistance (CECRA)?

You would be considered an eligible tenant as long as you have a valid lease agreement in place that is comparable to market value.

40. We rent month-to-month and don't have a lease – are we eligible for the Canada Emergency Commercial Rent Assistance (CECRA)?

A formal agreement must be in place to be eligible, but the agreement can be month-to-month. The agreement must have been in place on or before April 1, 2020.

41. I rent space at the bottom of an apartment building, am I considered an eligible tenant for the Canada Emergency Commercial Rent Assistance (CECRA)?

Yes, commercial tenants of mixed-use buildings are eligible (providing they meet all the criteria)

42. The space rent in a mixed-use building is less than 30% commercial. Am I still eligible for Canada Emergency Commercial Rent Assistance (CECRA)?

CMHC has confirmed that the 30% was an early policy requirement, but that it has since been removed.

43. I am a sub-landlord, can I apply for Canada Emergency Commercial Rent Assistance (CECRA)?

Only Property owners can apply for CECRA; however, sub-landlords can benefit from CECRA.

44. I have a foreign landlord - will I still be eligible for the Canada Emergency Commercial Rent Assistance (CECRA)?

Yes, providing you and your landlord meet all the other eligibility criteria.

45. Are there provincial differences around the key eligibility criteria for the Canada Emergency Commercial Rent Assistance (CECRA)?

No.

46. My municipality/province has provided tax relief – can I access both the provincial program and the Canada Emergency Commercial Rent Assistance (CECRA)?

You cannot double dip. The total rent relief cannot be more than 75%. If some relief has been provided through other mechanisms, like property tax relief, they will be counted towards the 75% reductions.

47. My tenants' businesses may not survive and the application seems onerous; as a landlord, why should I apply for the Canada Emergency Commercial Rent Assistance (CECRA)?

Many businesses are barely hanging on; this program could be what saves them. That said, you have a business to run as well and need to decide if it is worth rolling the dice on this program to keep your current tenant, or to try and find a new business to rent to, in an economy that will have a lot less potential renters.

48. If the Canada Emergency Commercial Rent Assistance (CECRA) is forgiven, as per the design of the program, does it become taxable income?

Yes, the forgivable portion of the loan is considered taxable in the property owner's income of the year in which the loan is received (i.e. 2020).

49. As a landlord, should I be offering the Canada Emergency Commercial Rent Assistance (CECRA) before I am approved for it?

Yes, if you can afford it and if you and your tenant meet the eligibility criteria for CECRA. However, note that the applications opened May 25th and it could take a few weeks to get the money

50. Can willing tenants pay more than 25% of their rent if they can afford it and still be in compliance with the terms of the Canada Emergency Rent Assistance (CECRA)?

CMHC says no. The intent of the CECRA program is to support small businesses who are suffering hardship.

# 51. Is a tenant still eligible for the Canada Emergency Commercial Rent Assistance (CECRA) if they have defaulted on their rent for April, May or June?

Yes, as long as they meet the eligibility requirements of the program.

# 52. As a landlord, if we apply for the Canada Emergency Commercial Rent Assistance (CECRA) are we required to charge our tenants 25%?

A landlord is welcome to provide additional relief to their tenants beyond the 75% rent reduction defined by the program.

# 53. What happens if my tenant claims they are down 70%, but I later find out they misrepresented their losses - who is on the hook to pay back the Canada Emergency Commercial Assistance (CECRA) loan?

If a tenant misrepresents their losses, the program will consider this a breach of the terms of the loan and will enter collection with the burden on the tenant.

There will be no penalty for the landlord, and landlords will not be held responsible for paying the loan if their tenants misrepresented their revenues. This is reinforced in Clause 4 of the property owner attestation where it says:

"The Property Owner has no knowledge, acting reasonably and without investigation, of any falsehood or misrepresentation contained in the Tenant Attestation(s) submitted by Impacted Tenant(s) in connection with the Agreement."

# 54. As a tenant, do I need to be down 70% in all 3 months to be eligible for the Canada Emergency Commercial Rent Assistance (CECRA) or is it on a month-by-month basis?

The 70% revenue reduction requirement can be achieved over the three-month period by averaging the monthly revenue declines. It is not necessary for the 70% reduction to be achieved in each individual month.

### 55. Can landlords apply only for one month of Canada Emergency Commercial Rent Assistance (CECRA)?

Landlords cannot apply for only one month. The program is designed so that you apply for all three months (April, May and June) or none at all.

# 56. How will I, as a tenant, know that my landlord has applied for the Canada Emergency Commercial Rent Assistance (CECRA)?

This will require ongoing communications with your landlord.

Some landlords may also put a notice on their website for their tenants to see.

# 57. If my landlord does not want to participate in the Canada Emergency Commercial Rent Assistance (CECRA) can I receive the 50% directly from the government to help with my rent?

No. As currently designed, the program requires the tenant and landlord to contribute 25% each and the government will provide the other 50% directly to the landlord.

# 58. If a landlord does not want to apply for the Canada Emergency Commercial Rent Assistance (CECRA), but the tenant cannot afford to pay rent due to COVID-19, can the landlord evict the tenant?

In many provinces commercial eviction protections have been put in place. We continue to push for remaining provinces to implement protections for commercial tenants.

# 59. If I am eligible for Canada Emergency Commercial Rent Assistance (CECRA), when do previously paid rents have to be returned to tenants?

The landlord and tenant must come to a mutual agreement on this. Rebates may be provided or discounts on future rents.

# 60. Who is paying for the Canada Emergency Commercial Rent Assistance (CECRA)? What is the provincial contribution?

The federal government will share the program funding costs with the provinces and territories 75%/25%. The total funding cost is estimated to be \$2,296 million.

B.C. will be contributing an estimated \$80 million. See more information here.

Alberta expects to commit up to \$67 million. See more information here.

Nova Scotia's anticipated contribution will be \$9.1 million. See more information here.

Ontario government is contributing \$241 million. See more information here.

Quebec government is contributing \$280 millions. See more information here (French only).

Please note, that CECRA is one program offered through CMHC, not multiple programs tailored to each province. As more provinces provide us with information, we will add the links in this section.

# 61. Will federal landlords be participating in the Canada Emergency Commercial Rent Assistance (CECRA)?

CECRA does not apply to properties owned by the federal, provincial, or municipal governments. However, there are certain exceptions, including airports, post-secondary institutions, hospitals, First Nation and indigenous organizations and governments, and crown corporations (must be deemed eligible by CMHC).

#### 62. Can municipal landlords apply for Canada Emergency Commercial Rent Assistance (CECRA)?

Municipal landlords are generally not eligible for the program, however, there are some exceptions (i.e. sub-landlords on a long-term lease and specific eligible crown corporations).

# 63. If I don't have a written lease agreement in place before April 1st, am I still eligible for the Canada Emergency Commercial Rent Assistance (CECRA)?

A verbal agreement is not considered a valid and enforceable agreement in regard to CECRA. A legally binding lease agreement must be in place on or before April 1, 2020, to be considered eligible. When in doubt, our recommendation is to still try to apply for CECRA through your landlord.

### 64. Are tenants' 2019 gross revenues an application requirement for the Canada Emergency Commercial Rent Assistance (CECRA)?

This information is no longer required for the application.

### 65. Can landlords ask for a tenant's business financials before applying for the Canada Emergency Commercial Rent Assistance (CECRA)?

Landlords do not need business financials to apply for CECRA. It is not in the spirit of the legislation or CECRA program to ask for them.

# 66. What happens if my lease expires before August 31st, am I still eligible for the Canada Emergency Commercial Rent Assistance?

Normal course renewals/extensions do not preclude a tenant from benefiting from the program. If the lease expires before August 31, 2020, the tenant may still be eligible for the CECRA program, provided the tenant and landlord are each committed and will remain committed to the month to month tenancy pursuant to the terms of the lease until at least August 31, 2020.

In the event that a lease expires before August 31, 2020 but the tenant has committed to entering into a new lease to continue to operate its business then such a tenant may be eligible for the program on an exceptional basis. The tenant must provide the program administrator with a copy of the signed

lease for the new location and any other requested documents to evidence that the tenant is committed to continue operating its business in a new location.

#### 67. Can tenants or landlords repay parts of the loan early if they can afford it?

There is no repayment of the loan required; the loan is fully forgiven provided that there is no event of default (Section 9 of the Forgivable Loan Agreement).

68. Can a Landlord receive CEBA and the CECRA?

Yes.

69. Should CEBA be included in the Canada Emergency Commercial Rent Assistance (CECRA) proceeds from other rental support programs if it was used to pay rent?

No, CEBA should not be considered a rent relief program and does not need to be included.

70. Does the gross rent amount for the Canada Emergency Commercial Rent Assistance (CECRA) include GST/HST?

GST and HST are excluded when determining gross rent.

71. Is GST/HST applicable to the forgivable loan amount received by the landlord through the Canada Emergency Commercial Rent Assistance?

HST is not included in gross rent/covered by CECRA. HST is only due on the reduced amount of rent agreed to (up to 25%). Eligible tenants are able to recover all or part of the HST on rent that is paid to the landlords.

72. What should a rent roll look like for the Canada Emergency Commercial Rent Assistance (CECRA)?

Please see the provided <u>CMHC rent roll template</u>.

73. How should a business calculate their revenues for the Canada Emergency Commercial Rent assistance (CECRA) if they have recently amalgamated two businesses and revenues were kept separate until the end of April?

In this circumstance they would consider the combined results from both businesses in assessing their qualification for CECRA for both the \$20 million gross annual revenue criteria and the financial hardship test of 70% reduction in revenue.

# 74. I am a property owner with more than one property. Do I need to create multiple Canada Emergency Commercial Rent Assistance (CECRA) logins to apply?

To ensure privacy of information, only one registered account can be created with a specific email/telephone number. A registered account may hold up to 100 applications per registrant and 50 tenants per application.

### 75. What if I am an Ultimate parent/owner with regards to the Canada Emergency Commercial Rent Assistance (CECRA)?

If you consolidated statements, then the tenant would use revenues reported for the group level of companies.

# 76. Where can I find CMHC's most up to date FAQ on the Canada Emergency Commercial Rent Assistance (CECRA)?

FAQs for the CECRA program can be found at the following two links:

- 1. <a href="https://cecra-apply.ca/Support/Help">https://cecra-apply.ca/Support/Help</a>
- 2. <a href="https://www.cmhc-schl.gc.ca/en/finance-and-investing/covid19-cecra-small-business">https://www.cmhc-schl.gc.ca/en/finance-and-investing/covid19-cecra-small-business</a>

### 77. Is there any way to apply for the Canada Emergency Commercial Rent Assistance (CECRA) without an email address or mobile phone that can receive a text message?

There are no alternatives at this time. CMHC is currently working on alternative processes.

How can I contact CMHC regarding the Canada Emergency Commercial Rent Assistance (CECRA)?

- E-mail <u>CECRA@cmhc.ca</u>
- The CECRA application line is 1-833-610-0515
- The general program inquiries line is 1-800-668-2642

Note that both of these lines are experiencing high call volumes (currently averaging a wait time of 1:20mins), and you may not be able to get through. CMHC has recommended that you leave a voicemail and that they will call you back.

We have raised these issues with CMHC; please let us know if you experience problems contacting CMHC.