

PH 3.2 KEY CHARACTERISTICS OF HOUSING ALLOWANCES

Definitions and methodology

This indicator presents information from the OECD Questionnaire on Social and Affordable Housing on the characteristics of housing allowances in OECD, key partner and EU countries, and provides details on the rules defining recipients' eligibility, as well as the types and amounts of costs covered. For the purpose of this indicator, we consider housing allowances to be *means- and/or income-tested income transfers to households directed at supporting households in meeting their housing costs* (Kemp 2007, OECD 2016, Stephens et al 2010).

Further information on housing allowances is provided under indicators PH 3.1 and PH 3.3.

Key findings

Most countries provide means tested housing allowances to assist low-income households with their rent and other housing costs

Altogether, 37 countries report having at least one type of housing allowance in place. Countries report a total of 63 measures, reflecting that many provide more than one type of housing allowance. Typically, countries may have a general housing allowance system, complemented by specific supplements for housing costs within other types of benefits (notably social assistance or minimum income schemes), or benefits that target specific groups (such as pensioners, youth/students, or those experiencing or at risk of homelessness). Only Belgium, Colombia and South Africa report that housing allowances are not available.

Eligibility for housing allowances in most countries is based on the household's income, size and composition, as well as the amount paid on housing costs. Indeed, there is a reported income threshold for 55 of the 62 reported measures. This information is then also used to determine the amount of the benefit (Salvi del Pero et al, 2016). Table PH 3.2.1 in Annex I provides details on the criteria determining eligibility for housing allowances.

In most countries, housing allowances are designed as entitlement programmes, meaning that all applicants who meet the eligibility criteria receive the benefit. However, in 11 countries – Austria, Chile, Costa Rica, Iceland, Lithuania, Mexico, Portugal, Slovak Republic, Sweden, United Kingdom (except Northern Ireland) and the United States – the allocation of at least some housing allowances is contingent upon availability of funding. In this case, different criteria are used to prioritise among eligible households (Salvi del Pero et al, 2016).

Housing allowances may be restricted to one or more tenure types. Most commonly, housing allowances are available to tenants in the private rental market: this is the case for 53 of the 62 reported measures in the OECD QuASH). Private renters are not eligible to receive any housing allowance in Bulgaria (where they are reserved for residents of municipal dwellings) and for one measure in New Zealand that targets people who are homeless. A little over half of reported housing allowances (34) are available to tenants in social rental housing; in many cases, social housing tenants may not be eligible for such benefits since social rents

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are determined based on household income. Slightly less than half of reported housing allowance measures are available to homeowners.

The amount of housing allowances is usually determined based on the household income and size and the level of housing costs

Costs that are taken into consideration and rules determining the amount of housing allowances are detailed under Table PH 3.2.2 in Annex I. The benefit amount is often capped to account for income levels, prevailing housing price levels and/or dwelling size, to ensure that the subsidy does not support overconsumption.

The amount of support provided to tenants usually takes into account both rental costs as well as other housing costs (including, for instance, the cost of utilities, insurance and service costs) in countries where allowances are open to homeowners. The amount of support is only based on rental costs in countries where the housing allowances are restricted to tenants.

Data and comparability issues

This indicator is based on answers to the 2019 and 2016 OECD Questionnaire on Social and Affordable Housing. Information collected through the questionnaire was complemented with Country Specific Information from the OECD Tax and Benefit database.

Sources and further reading:

Kemp, Peter (2007), *Housing allowances in comparative perspective*, Policy Press University of Bristol.

MISSOC - Mutual Information System on Social Protection, Comparative Tables Database, www.missoc.org/

OECD (2018), Benefits and wages: Country policy descriptions, www.oecd.org/social/benefits-and-wages.htm

Salvi del Pero, A. et al. (2016), *Policies to promote access to good-quality affordable housing in OECD countries*. OECD Social, Employment and Migration Working Papers, No. 176, OECD Publishing, Paris.
<http://dx.doi.org/10.1787/5jm3p5ql4djd-en>

Stephens, M., et al. (2010), *Study on Housing Exclusion: Welfare Policies, Labour Market and Housing Provision*. Brussels: European Commission.

Table PH3.2.1: Characteristics of housing allowances: details on eligibility

HO= home owners; **SR**= tenants in social rental housing; **PR**= tenants in private rental housing; **Other** = residents in other types of tenures

Measure Name	Available to:				Details on eligibility:		
	HO	SR	PR	other	Income threshold	Conditional on other benefits	Other eligibility criteria
Australia (2) Commonwealth Rent Assistance (CRA)	No	No	Yes	Yes (community housing)	Yes	Yes	The tenant must be in receipt of an eligible social security payment and be paying more than a minimum level of rent called the 'rent threshold'
Austria Needs-based minimum benefit (BMS)	No	Yes	Yes	Yes	Yes	Yes	Recipients of needs-based minimum benefit scheme, willing to or looking for work. Available to Austrian citizens and persons with equal status.
Austria Housing allowance (<i>Wohnbeihilfe</i>)	No (only in some provinces)	Yes	Yes	No	Yes	No	In some provinces, a minimum net-income per month is required. Furthermore, not available to tenants with family relationships to lessors
Austria Rental benefit (<i>Mietbeihilf</i>)	No	Yes	Yes	No	Yes	Yes	Reserved for recipients of pension or minimum income scheme benefits, Mietbeihilfe is paid in addition to Wohnbeihilfe if the amount of the rent leads to a total income below a certain level

Available to:

Details on eligibility:

	Measure Name	Available to:				Details on eligibility:		
		HO	SR	PR	other	Income threshold	Conditional on other benefits	Other eligibility criteria
Bulgaria (1)	Targeted assistance for rent of municipal housing	No	Yes	No	No	Yes	No	Tenants in municipal housing orphaned by age 25, graduated from the Social-Educational Centre; persons aged above 70 living alone; single parents
Bulgaria (1)	Monthly allowance for social integration - rent for municipal housing	No	Yes	No	No	No	Yes	Supplement for tenants with disabilities in municipal housing
Bulgaria (1)	Targeted assistance for heating for individuals and families through the heating season	Yes	Yes	Yes	No	Yes		Additional conditions set by the Implementing Regulations of the Social Assistance Act
Canada (3)
Chile (4)	Rental subsidy D.S. No. 52 of 2013 (<i>Subsidio de Arriendo D.S. N° 52 de 2013</i>)	No	N/A	Yes	Yes	Yes	No	Applicants cannot own a dwelling. They must be aged over 18 at the time of application. They must have a minimum amount of savings in a dedicated savings account and earn a minimum household size-adjusted income. Priority is given to applicants in certain circumstances, including single parents and those with disabilities.
Costa Rica	Rent subsidy (<i>Atención a Familias, Pago de Alquiler</i>)	No	No	Yes	Yes	Yes	..	The benefit is intended for households living in poverty and in immediate assistance to access housing.
Croatia (1)	Housing benefits	Yes	Yes	For recipients of guaranteed minimum social assistance benefit

Available to:

Details on eligibility:

Measure Name	Available to:				Income threshold	Conditional on other benefits	Other eligibility criteria	
	HO	SR	PR	other				
Croatia (1)	Fuel allowance		
Croatia (1)	Benefit for Energy Buyers at risk		
Cyprus (1,5)	Housing Allowance under Guaranteed Minimum Income	yes	Yes	Yes	Yes	For unemployed registered with Public Employment Services and willing to accept a job, and low paid employees. The applicant must have been legally residing in the controlled area of Cyprus continuously for at least five years. There are limits on assets, but home ownership is not taken into account in the means-testing when the dwelling is the main residence and does not exceed 300 square metres
Czech Republic	Housing allowance (<i>Príspevek na bydlení</i>)	Yes	Yes	Yes	..	Yes	No	Property owners or tenants must be registered as resident in the dwelling for which the allowance is granted.
Czech Republic	Housing supplement (<i>Doplatek na bydlení</i>)	Yes	Yes	Yes	Yes	Yes	Yes	For social assistance recipients (families and individuals in material need). Can be granted in addition to the <i>Príspevek na bydlení</i> for households who are still unable to cover their basic necessities.
Denmark (6)	Housing benefit (<i>Boligstøtte</i>)	Yes*	..	Yes	No	No	No	Housing benefit is granted after an objective calculation based on the housing expenditure, the income of the household, the area of the dwelling and the composition of the household, including the presence of children (Consolidated Act No 48 of 16 January 2019 on individual Housing Benefits).

Available to:

Details on eligibility:

	Measure Name	Available to:				Income threshold	Conditional on other benefits	Other eligibility criteria
		HO	SR	PR	other			
Denmark (6)	Housing benefit - for pensioners (<i>Boligyldelse</i>)	Yes*	Yes	Yes	Yes*	No	Yes	Only for recipients of old age pension and disability benefits according to pension rules implemented until January 2003
Estonia	Housing costs under Subsistence benefits (<i>Toimetulekutoetus</i>)	Yes	Yes	Yes	Yes (e.g. persons living in a dwelling rent-free but paying utilities)	Yes	..	The benefit is granted to persons legally registered as residents, if the income after payment of housing costs is below the subsistence level.
Finland	General housing allowance (<i>Yleinen asumistuki</i>)	Yes	Yes	Yes	Yes (right-of-occupancy and partial-ownership)	Yes	No	No additional requirements
Finland	Housing allowance for pensioners (<i>Eläkkeensaajan asumistuki</i>)	Yes	Yes	Yes	Yes	Yes	Yes	Low-income pensioners
France	Personalised housing subsidy (<i>Aide personnalisée au logement, APL</i>)	Yes	Yes	Yes	Yes (institutional housing, care homes, shelters)	Yes	No	Available to tenants renting a new or existing home that is under a contract between the owner and the State as regards to the rent level, lease duration and maintenance conditions, and to owner-occupiers under a loan agreement with the State. Beneficiaries cannot benefit from AFL or ALS at the same time.

Available to:

Details on eligibility:

	Measure Name	HO	SR	PR	other	Income threshold	Conditional on other benefits	Other eligibility criteria
France	Family housing subsidy (<i>Allocation de Logement Familiale, AFL</i>)	Yes	Yes	yes	Yes (institutional housing, care homes, shelters)	Yes	No	Available to any household who is not eligible for APL (for instance because the home he/she rents is not under a contract with the State), who has a "family responsibility" (e.g. dependent children or elderly people in their care). Cannot benefit from APL or ALS at the same time.
France	Social housing subsidy (<i>Allocation de Logement Social ALS</i>)	Yes	Yes	yes	Yes (institutional housing, care homes, shelters)	Yes	No	Available to any household having to pay a rent or a mortgage and not eligible for APL or AFL. It is mainly aimed at supporting young people, students, couples without kids, elderly people and persons with disabilities
Germany	Housing allowance (<i>Wohngeld nach dem Wohngeldgesetz</i>)	Yes	Yes	Yes	Yes	Yes	No	In addition to income, wealth is also taken into consideration in assessing eligibility. It is possible that individuals in a household receive different forms of housing benefits, but only person can benefit from one form of housing benefit at a time.
Germany	Costs for housing and heating under unemployment benefit II (<i>Arbeitslosengeld II, Sozialgeld</i>)	Yes	Yes	Yes	Yes	Yes	Yes	Recipients of unemployment benefits. Benefits are only granted insofar as applicants are in need and they are not able to secure their livelihood from their own income or property.
Germany	Housing and heating costs under social assistance (<i>Hilfe zum Lebensunterhalt / Grundsicherung im Alter und bei Erwerbsminderung</i>)	Yes	Yes	Yes	Yes (living in institutional care)	Yes	Yes	Recipients of social assistance (targeted at elderly persons and people with disabilities). Benefits are only granted insofar as persons in need are not able to secure their livelihood from their own income or property.

Available to:

Details on eligibility:

	Measure Name	HO	SR	PR	other	Income threshold	Conditional on other benefits	Other eligibility criteria
Greece	Housing allowance (<i>Epidoma stegasis</i>)	No	No	Yes	Yes (households receiving other benefits)	Yes		Available to households receiving other types of benefits (e.g. disability and family benefits, Social Solidarity Income (Minimum Guaranteed Income)).
Greece	Housing and work for the homeless (<i>Stegasi kai ergasia gia tous astegous</i>)	(only if inadequate dwelling)	Not applicable	(only if under threat of eviction)	Yes (people living rough, in shelters or facing homelessness)	Yes	No	Targeted at persons/households who are homeless or living in inadequate housing conditions. Households may receive other benefits, with the exception of the housing allowance.
Greece	Housing allowance for uninsured elderly (<i>Stegastiki syndromi</i>)	No	No	Yes	Yes	Yes	..	Targeted at the uninsured elderly; beneficiaries of the social solidarity benefit may be eligible for this allowance, as are people who receive disability benefits.
Hungary	Home maintenance aid	Yes	Yes	Yes	..	Yes	No	Family or individual who lives in a home not exceeding specified size limits, and whose property (real estate excluding the dwelling where the claimant lives, and vehicles) has a value below a given maximum ceiling

Available to:

Details on eligibility:

	Measure Name	Available to:				Income threshold	Conditional on other benefits	Other eligibility criteria
		HO	SR	PR	other			
Hungary	Housing allowance (<i>Lakhatási támogatás</i>)	No	Yes	Yes	..	No	No	The benefit is available from local employment services to those who find a job (for a minimum period of 6 months and at least for 20 hours/week) after a period of unemployment. The housing allowance is granted if the workplace is further than 60 km from the applicant's residence. The applicant must have been registered as job seeker for at least 1 month. The benefit is on a temporary basis, up to 12 months.
Iceland	Housing benefit (<i>Húsnæðisbætur</i>)		Yes	Yes	Yes	Yes	No	In addition to income test, there is also a net wealth test. The rental property must meet minimum quality requirements. A household is not eligible for housing benefits if it is renting housing that is registered for commercial use.
Ireland	Housing Assistance Payment	No	No	Yes	..	Yes	..	Any household assessed as eligible for social housing is immediately eligible for housing support through the Housing Assistance Payment (HAP) scheme. Once a household has been deemed eligible for social housing support, it is a matter for the local authority to examine the suite of social housing supports available, including the HAP scheme, to determine the most appropriate form of social housing support for that household in the administrative area of that local authority.

Available to:

Details on eligibility:

	Measure Name	HO	SR	PR	other	Income threshold	Conditional on other benefits	Other eligibility criteria
Ireland	Rent Supplement	No	No	Yes	Yes (accommodation for homeless)	Yes	Yes	[NB: This benefit has in most cases been replaced by the Housing Assistance Payment, but is still available in a few cases.] To qualify, a person must be in receipt of Social Welfare or Health Service Executive payment and satisfy the general conditions of entitlement to SWA. Claimants must have been assessed as in "housing need" or have been residing in private rented accommodation that became unaffordable, or in accommodation for homeless or institution for 183 days in the 12 months before the claim.
Israel (7)	Rent Assistance	No	Yes	Yes		Yes	..	Must meet threshold criteria on sources of income and family size. The benefit is subject to a "credit system" which ranks eligibility for housing benefit (credit points of entitlement). Claimant must not presently own or have owned in the past an apartment (or any portion thereof), must be a full-time employee or working 165 hours/month.
Japan	Housing security benefit (<i>Jutaku-Kakuho-Kyufukin</i>)	No	Yes	Yes	..	Yes	No	Three conditions must be met to receive the benefit, relating to i) income, ii) property (there is a limit on the amount of applicant's savings, which varies according to the household size), and iii) employment status (claimant must be seeking a job). Claimants must be unemployed and aged under 65.
Japan (1)	Public assistance (housing assistance)	No	Yes	Yes	No	Yes	No	Public assistance shall be provided based on a requirement that a person who is living in poverty shall utilise his/her assets, abilities and every other thing available to him/her for maintaining a minimum standard of living.
Korea	Housing benefit for rented accommodation	Yes	..	Yes	No	Households whose recognised income level is less than 43% of median income

Available to:

Details on eligibility:

	Measure Name	HO	SR	PR	other	Income threshold	Conditional on other benefits	Other eligibility criteria
Latvia	Housing benefit (<i>Dzīvokļa pabalsts</i>)	Yes	No	Yes	..	Yes	No	Housing costs and rules defining whether a family or a person is eligible to receive the benefit vary by municipality.
Lithuania	Compensations for heating of a dwelling, hot and drinking water costs (<i>Būsto šildymo išlaidų, geriamojo vandens išlaidų ir karšto vandens išlaidų kompensacijos</i>)	Yes	Yes	Yes	..	Yes	..	Claimants must meet the requirements of the Law of the Republic of Lithuania on Cash Social Assistance for Poor Residents, relating to the value of assets and any debts accrued for heating or water have concluded in a repayment agreement with the provider(s). The benefit is granted if: i) the costs of heating is more than 20% of the difference between the beneficiary's income and the State Support Income (EUR 102) provided to a household or person living alone; ii) the costs of drinking water is more than 2% of the beneficiary's income; iii) the costs of hot water is more than 5% of the beneficiary's income.
Lithuania (1)	Compensation for part of lease payment (<i>Būsto nuomos mokescio dalies kompensacija</i>)	Yes	..	Yes	No	Depending on the municipalities: persons and families who lost their homes because of <i>force majeure</i> , large families, and disabled people.
Luxembourg	Rental subsidy (<i>Subvention de loyer</i>)	No	No	Yes	No	Yes	No	Only for tenants in the private rental market. The rent must exceed more than 25% of the income and the applicant must not be owner of a dwelling in Luxembourg or abroad.
Luxembourg	Accommodation allowance (<i>Accueil g�erontologique</i>)	Care centres for the elderly	Yes	...	Allowance for low-income people living in care centres for the elderly.
Malta	Housing benefit	No	No	Yes	No	Yes	No	Income and asset limits.
Mexico	<i>Piloto de arrendamiento</i>	No	No	Yes	No	Yes	No	Maximum rent levels apply, as a share of household income.

Available to:

Details on eligibility:

	Measure Name	Available to:				Details on eligibility:		
		HO	SR	PR	other	Income threshold	Conditional on other benefits	Other eligibility criteria
Netherlands	Housing benefit (<i>Huurtoeslag</i>)	No	Yes (if the rent is below max rent level)	Yes (if the rent is below max rent level)	No	Yes	No	Maximum rent levels apply (see PH3.2.2), based on household size/composition and age.
New Zealand	Accommodation Supplement	Yes	No	Yes	Yes (boarding houses, non-tenant flatmates)	Yes	No	Assets below certain limits (varying according to the household composition)
New Zealand	Accommodation Benefit for Students	Yes	No	Yes	Yes	Yes	Yes	Only for students eligible for Student Allowance. Student with an earning partner or spouse are not eligible for Student Allowance and therefore not eligible for Accommodation Benefit for Students.
New Zealand	Emergency Housing Special Needs Grant	No	No	No	Have emergency housing need	Yes	No	For clients to receive this benefit, they must have an immediate emergency housing need (i.e. have no access to other accommodation that is adequate for their needs in the short-term), and meet the following criteria: i) not receiving the benefit would worsen the client's position or increase or create any risk to the life or welfare of the client or the client's immediate family or cause serious hardship to the client, the client's partner or dependent children; ii) meet an income and cash asset test (unless exceptional circumstances apply); iii) meet residency and ordinarily resident requirements; and iv) not have received a Special Needs Grant for emergency housing within 52 weeks (unless there are exceptional circumstances).

Available to:

Details on eligibility:

	Measure Name	HO	SR	PR	other	Income threshold	Conditional on other benefits	Other eligibility criteria
Norway	State housing allowance (<i>Bostøtte</i>)	Yes	Yes	Yes	Yes	Yes	No	There is a minimum housing expense per year to be eligible for the state housing allowance. Students (unless they have children living with them) and people serving the military are not eligible. Household must meet minimum quality standards. Assets are also taken into account to determine eligibility.
Poland	Housing allowance (<i>Dodatek mieszkaniowy</i>)	Yes	Yes	Yes	Yes	Yes	No	Applicants must meet income threshold (below 175% of the minimum retirement pension for a single person, and below 125% of the minimum retirement pension per capita for a family), and dwelling must conform to space limits adjusted for household size/composition.
Portugal	<i>Porta 65 - Jovem</i>	No	No	Yes	No	Yes	No	Available to young households aged between 18 and 35 years old. The rent level and size of dwelling must meet certain requirements.
Portugal	Subsidy NRAU Law nº6/2006 (<i>Novo Regime Arrendamento Urbano</i>)	No	No	Yes	No	Yes	No	Must be over 65 years old. Available only to contracts dating from before 1990, and is reserved for renters who experienced an extraordinary increase in rent levels following Law 6/2006, as long as the household income and rents respect the limits set in an annually published table.
Slovak Republic	Housing allowance (<i>Prispevok na bývanie</i>)	Yes	Yes	Yes	Yes	Yes
Slovenia	Housing benefit (<i>Subvencija najemnine</i>)	No	Yes	Yes	Yes (janitorial dwellings, living quarters)	Yes	..	Housing benefit can be claimed by households who are renting and whose income is under certain threshold.

Available to:

Details on eligibility:

	Measure Name	HO	SR	PR	other	Income threshold	Conditional on other benefits	Other eligibility criteria
Sweden	Housing allowance (<i>Bostadsbidrag</i>)	Yes	not applicable	Yes	Yes (municipal rental housing)	Yes	No	Housing allowance targeting families with children and young people 18 - 28 years without children.
Sweden	Housing supplement for pensioners (<i>Bostadstillägg för pensionärer</i>)	Yes	not applicable	Yes	Yes (municipal rental housing)	Yes	..	Housing supplement is a tax-free benefit that you can receive for your housing if you are over 65 and take out your entire old age pension. If you are married, cohabiting or a registered partner, it is the joint income and assets that count.
Switzerland	Housing subsidy (<i>Zusatzverbilligung ZV</i>)	Yes	Yes	..	No	Yes	No	It varies across cantons. The scheme will be phased out (2031).
United Kingdom (8)	Housing Benefit	No	Yes	Yes	No	Yes	No	<i>[NB: The housing benefit will be replaced by Universal Credit.]</i> Besides income limits, beneficiaries cannot have savings over a certain level. Only one person per household can claim housing benefit.
United States	Housing Choice Vouchers	Yes	No	Yes	Yes (mobile homes, but uncommon)	Yes	No	Housing Choice Voucher funding is limited relative to need as measured by the income qualification standard, so only about 25% of eligible households are served. Rents must be at or below a payment standard determined by administering state or local agencies relative to local market rents as estimated by the Federal government.
United States	Low-Income Home Energy Assistance Programme	Yes	..	Yes	Yes	Yes	No	Income-eligibility at (1) no more than the greater of 150% of the Federal Poverty Guidelines (FPG) or 60% of the State Median Income; and (2) no less than 110% of FPG. Higher benefits are granted to households with the greatest home energy need in relation to household income and number of household members; benefits must also be targeted to households with members who are elderly, disabled, and/or a young child.

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Notes:

1) Information for Bulgaria, Croatia, Cyprus, Japan (public assistance measure), Lithuania (Compensation for part of lease payment) refer to 2016 OECD Questionnaire on Affordable and Social Housing (QuASH). Information for all other countries refer to 2019 OECD QuASH. Supplemental information was also taken from the country policy descriptions in the OECD Tax-Benefit Database (www.oecd.org/social/benefits-and-wages/).

2) Australia: Some states/territories provide additional housing allowances. For example, New South Wales provides "Rent Choice", a time-limited cash transfer, paid directly to the landlord, to help disadvantaged individuals sustain a tenancy in the private rental market.

3) Canada: No currently active national housing allowances. However, the forthcoming Canada Housing Benefit (active from April 2020) will provide cash support to low-income tenants in social rental and privately rented housing.

4) Chile: Housing allowance is contingent to the availability of funding. In Chile, allocation is defined based on a point system prioritising: households with children and/or persons with disabilities; persons who have done military service; victims of political persecution; individual/households who have repeatedly applied for support.

5. a) Footnote by Turkey: The information in this document with reference to « Cyprus » relates to the southern part of the Island. There is no single authority representing both Turkish and Greek Cypriot people on the Island. Turkey recognizes the Turkish Republic of Northern Cyprus (TRNC). Until a lasting and equitable solution is found within the context of United Nations, Turkey shall preserve its position concerning the "Cyprus issue"; b) Footnote by all the European Union Member States of the OECD and the European Commission: The Republic of Cyprus is recognized by all members of the United Nations with the exception of Turkey. The information in this document relates to the area under the effective control of the Government of the Republic of Cyprus.

6) Denmark: Homeowners can only receive housing benefit as a repayable loan. People living in institutional dwellings cannot receive Boligydelse.

7) The statistical data for Israel are supplied by and under the responsibility of the relevant Israeli authorities. The use of such data by the OECD is without prejudice to the status of the Golan Heights, East Jerusalem and Israeli settlements in the West Bank under the terms of international law.

8) United Kingdom: Information on housing benefits presented in this indicator covers the entire United Kingdom, with the exception of Northern Ireland.

Source: OECD Questionnaire on Affordable and Social Housing (QuASH, 2019); country policy descriptions in the OECD Tax-Benefit Database (www.oecd.org/social/benefits-and-wages/).

Last updated on 16/12/2019

Table PH3.2.2: Characteristics of housing allowances: covered costs and benefit's amount

	Measure Name	Administration level	Type of costs covered	Amount depends on
Australia (2)	Commonwealth Rent Assistance (CRA)	National/Federal	for rental costs	CRA covers 75% of rent paid above the specified minimum rent threshold, up to a maximum rate. Maximum rates and minimum rent thresholds vary according to household's size/composition
Austria	Needs-based minimum benefit (BMS)	Regional/State	for rental and housing costs	The flat rate minimum benefit includes a share of 25% for accommodation costs. If actual housing costs are lower, the share may be reduced. Some provinces pay higher amounts for higher housing costs.
Austria	Housing allowance (<i>Wohnbeihilfe</i>)	Regional/State	for rental costs (in most provinces)	The allowance covers the difference between countable housing expenditure (the legally permitted rent laid down in the lease contract) and what are considered to be reasonable housing expenditure. The amount depends on the rent, the household income and composition/size, the size of the dwelling and whether the dwelling has been built/renovated with public subsidies or not.
Austria	Rental benefit (<i>Mietbeihilf</i>)	Regional/State	for rental and housing costs	The amount depends on monthly rent, household's income and size, and size of the dwelling. It is paid as an addition to <i>Wohnbeihilfe</i> .
Bulgaria (1)	Targeted assistance for rent of municipal housing	National/Federal	for rental costs	The amount depends on the rent in the specific home allocated
Bulgaria (1)	Monthly allowance for social integration - rent for municipal housing	National/Federal	for rental costs	The amount depends on the individual needs according to the degree of reduced capacity
Bulgaria (1)	Targeted assistance for heating for individuals and families through the heating season	National/Federal	for other housing costs	The monthly amount is the same for all eligible persons: it is based on the equivalent of a set amount of electricity, according to average retail price of electricity for household consumers to October 31 of the current calendar year. The benefit is only granted between 1 November and 31 March.

	Measure Name	Administration level	Type of costs covered	Amount depends on
Canada (3)
Chile (4)	Rental subsidy D.S. No. 52 of 2013 (<i>Subsidio de Arriendo D.S. N° 52 de 2013</i>)	Regional/State (with funding from national level)	for rental costs	Earmarked voucher paid directly to the landlord. The amount varies depending on the location and is paid monthly. The total amount paid cannot exceed a total of CLP 4 700 000.
Costa Rica	Rent subsidy (<i>Atención a Familias, Pago de Alquiler</i>)	National/Federal	for rental costs	The subsidy is granted temporarily according to the needs of the household, based on a professional assessment with a caseworker.
Croatia (1)	Housing benefits	Municipal	for rental and housing costs	Amount depends on income and household composition/size
Croatia (1)	Fuel allowance	Regional/State	for other housing costs	..
Croatia (1)	Benefit for Energy Buyers at risk	National/Federal	for other housing costs	..
Cyprus (1,5)	Housing Allowance under Guaranteed Minimum Income	National/Federal	For rental and housing costs	Support is available under the Guaranteed Minimum Income scheme to help with rent and mortgage payments. The amount varies according to location and household size/composition (additional amount for each person with disability and each additional child in the household)
Czech Republic	Housing allowance (<i>Príspevek na bydlení</i>)	National/Federal	For rental and housing costs	The amount of monthly benefit is calculated as 30% (35% in Prague) of the difference between the maximum reference housing costs and the household's reference income. Actual individual housing cost are used for the calculation of housing allowance, provided that actual individual housing costs are lower than prescriptive housing costs (stipulated by law for each year according to actual development of prices).
Czech Republic	Housing supplement (<i>Doplatek na bydlení</i>)	National/Federal	For rental and housing costs	The amount of benefit depends on income, household composition, rental costs, the size/condition of the dwelling, and the type of housing.

	Measure Name	Administration level	Type of costs covered	Amount depends on
Denmark	Housing benefit (<i>Boligstøtte</i>)	Municipal	for rental costs	Calculated based on normalised rent, household size, dwelling size, level of household income and assets.
Denmark	Housing benefit - for pensioners (<i>Boligyldelse</i>)	..	for rental and housing costs	Calculated based on rental costs, household size and composition, dwelling size, level of household income and assets.
Estonia	Housing costs under Subsistence benefits (<i>Toimetulekutoetus</i>)	Municipal (with funding form national level)	for rental and housing costs	Housing-related expenses taken into account to calculate the subsistence benefit include rent, administration and repairs costs of the apartment building, repayment of loan taken for renovation of the apartment building, service costs, cost of utilities, land tax, building insurance, and municipal waste fee. Costs are only covered within the limits established by the municipality and the national socially justified standard for dwelling, and vary according to household's size/composition
Finland	General housing allowance (<i>Yleinen asumistuki</i>)	National/Federal	for rental and housing costs	General housing allowance is paid for acceptable housing costs up to a statutory maximum limit. It covers 80% of the difference between the acceptable housing costs and the basic deductible. The basic deductible is determined on the basis of household income and household composition.
Finland	Housing allowance for pensioners (<i>Eläkkeensaajan asumistuki</i>)	National/Federal	for rental and housing costs	Housing allowance for pensioners covers 85% of the difference between the acceptable housing costs and the basic deductible (a standard amount beneficiary is supposed to pay out of his/her own pocket), plus an additional deductible linked to income. Acceptable housing costs may not exceed maximum limits set each year by government, which vary according the municipality in which the home is located. The basic deductible is a standard amount for all.
France	Personalised housing subsidy (<i>Aide personnalisée au logement, APL</i>)	National/Federal	for rental and housing costs	The amount is calculated based on the rent and location of the dwelling, the household's income and size/composition. The benefit increases as a) household income decreases; b) the number of children increases; c) housing expenses increase (with a rent ceiling determined by the State).

	Measure Name	Administration level	Type of costs covered	Amount depends on
France	Family housing subsidy (<i>Allocation de Logement Familiale, AFL</i>)	National/Federal	for rental and housing costs	The amount is calculated based on the rent and location of the dwelling, the household's income and size/composition. The benefit increases as a) household income decreases; b) the number of children increases; c) housing expenses increase (with a rent ceiling determined by the State).
France	Social housing subsidy (<i>Allocation de Logement Social ALS</i>)	National/Federal	for rental and housing costs	The amount is calculated based on the rent and location of the dwelling, the household's income and size/composition. The benefit increases as a) household income decreases; b) the number of children increases; c) housing expenses increase (with a rent ceiling determined by the State).
Germany	Housing allowance (<i>Wohngeld nach dem Wohngeldgesetz</i>)	National/Federal	for rental and housing costs	The amount of the allowance is calculated based on eligible housing costs (rent level or financial obligations for homeowners), household's income and size; there are also regional factors taken into account.
Germany	Costs for housing and heating under unemployment benefit II (<i>Arbeitslosengeld II, Sozialgeld</i>)	Municipal (with funding from the federal level)	for rental and housing costs	Amounts vary by municipality and depend the household size and composition, and on housing costs: the latter include reasonable rent (determined locally) and in case of home owners mortgage interest payment, real property tax and other public charges, residential building insurance, ground rent, incidentals as in the case of rented flats, refuse collection fee, chimney sweep fee, street cleaning. Regular expenses for heating are also covered.
Germany (6)	Housing and heating costs under social assistance (<i>Hilfe zum Lebensunterhalt / Grundsicherung im Alter und bei Erwerbsminderung</i>)	Municipal (see note)	for rental and housing costs	Amount depends on income, household composition/size and housing costs.
Greece (7)	Housing allowance (<i>Epidoma stegasis</i>)	National and municipal (see note)	for rental costs only	The amount varies according to household income and size/composition.

	Measure Name	Administration level	Type of costs covered	Amount depends on
Greece (7)	Housing and work for the homeless (<i>Stegasi kai ergasia gia tous astegous</i>)	National and municipal (see note)	for rental and housing costs, and other	The programme targets people facing homelessness and specifically those living rough, in night shelters or temporary accommodation and in inadequate housing conditions. A monthly rent subsidy for up to 18 months is provided. The amounts depends on housing situation and the household's size/composition.
Greece (7)	Housing allowance for uninsured elderly (<i>Stegastiki syndromi</i>)	National/Federal	for rental costs only	The amount depends on rental costs and the size/characteristics of the dwelling. The maximum amount of the benefit is up to EUR 362 per month.
Hungary	Home maintenance aid	Local government (but regulated at national level)	for other housing costs	The amount of the home maintenance aid depends on the dwelling size as well as the household's income and size/composition. The measure was repealed in March 2015, and only provides benefits to those who submitted claims through 28 February 2015; after this date, the benefit is only provided in the form of debt management service.
Hungary	Housing allowance (<i>Lakhatási támogatás</i>)	Local government (but regulated at national level)	for rental and housing costs	Employment departments of local level government offices provide the support. The support is provided according to the rules of Gov. Decree 39/1998. (III. 4.) and a national methodological guideline of Ministry of National Economy, with the amount depending on household size/composition.
Hungary	Housing benefit (<i>Húsnæðisbætur</i>)	Local government (but regulated at national level)	for rental and housing costs	Employment departments of local level government offices provide the support. The support is provided according to the rules of Gov. Decree 39/1998. (III. 4.) and a national methodological guideline of Ministry of National Economy, with the amount depending on household size/composition.
Ireland	Housing Assistance Payment	Joint	for rental costs	The amount depends on household income and size/composition, rental costs and dwelling characteristics, including location.

	Measure Name	Administration level	Type of costs covered	Amount depends on
Ireland	Rent Supplement	National/Federal	for rental costs	<i>[NB: This benefit has in most cases been replaced by the Housing Assistance Payment, but is still available in a few cases.]</i> The amount of Rent Supplement ensures that income, after paying rent, does not fall below a minimum level, corresponding to the basic Supplementary Welfare Allowance rate for a person's circumstances minus EUR 30 (or at least EUR 35 for a couple). A person must always pay at least EUR 30 towards rent. However, some may pay more depending on means.
Israel (8)	Rent Assistance	National/Federal	for rental costs	The amount depends on the following parameters: i) area of residence; ii) family size and composition; iii) age; iv) income test; and v) eligibility to certain benefits. Single parents, People with disabilities, immigrants, and applicants on the waiting list for public housing can receive enhanced assistance.
Japan	Housing security benefit (<i>Jutaku-Kakuho-Kyufukin</i>)	National/Federal	for rental costs	The amount depends on income, on household's size/composition and on rental costs. The maximum benefit amount is the actual rent paid for accommodation, up to a maximum benefit amount set regionally.
Japan	Public assistance (housing assistance)	National/Federal	for rental costs	The amount covers actual expenses, below a prescribed upper limit set for each local government by the Ministry of Health, Labour and Welfare
Korea	Housing benefit for rented accommodation	National and municipal	for rental costs	Implemented as part of the Housing Benefit Act in 2015, which aims to relieve the rent burden and to ensure the minimum housing standard for vulnerable households. The monthly cash subsidy is based on household income, rent level, family size and location.
Latvia	Housing benefit (<i>Dzivokla pabalsts</i>)	Municipal	for rental and housing costs	Housing benefit can be calculated based on the housing cost allocation and expenses defined by municipality, or using a fixed amount of benefit for person or household.

	Measure Name	Administration level	Type of costs covered	Amount depends on
Lithuania	Compensations for heating of a dwelling, hot and drinking water costs (<i>Busto šildymo išlaidu, geriamojo vandens išlaidu ir karšto vandens išlaidu kompensacijos</i>)	Municipal	for other housing costs	The amount of compensations depend on heating of the dwelling, hot and drinking water expenses. The benefit covers exceeding costs (over 20% of the difference between income and State Support Income for heating, over 2% of income for drinking water, over 5% of income for hot water)
Lithuania	Compensation for part of lease payment (<i>Busto nuomos mokescio dalies kompensacija</i>)	Municipal	for rental costs	The amount depends on household composition/size.
Luxembourg	Rental subsidy (<i>Subvention de loyer</i>)	National/Federal	for rental costs	The amount is calculated on the basis of household income, household composition and a reference rent that varies according to the household's composition and income, up to a maximum monthly benefit of EUR 300.
Luxembourg	Accommodation allowance (<i>Accueil gérontologique</i>)	National/Federal	for housing and other costs	The amount depends on the level of services as well as the personal resources of the beneficiary.
Malta	Housing benefit	National/Federal	for rental costs	The amount of benefit depends on the household's income and size.
Mexico	<i>Piloto de arrendamiento</i>	National/Federal	for rental costs	Covering up to a maximum ceiling of rent.
Netherlands	Housing benefit (<i>Huurtoeslag</i>)	National/Federal	for rental costs	Housing benefit is based on current rent levels and taxable income. The underlying principle is that every household always pays part of the rent itself. This is referred to as the "standard rent" (<i>basishuur</i>), whose amount varies depending on the income and composition of household and age of its members. There was a higher standard rent for people with a higher income.

	Measure Name	Administration level	Type of costs covered	Amount depends on
New Zealand	Accommodation Supplement	National/Federal	for rental and housing costs	The calculation of the Accommodation Supplement is based on actual accommodation costs. The benefit provides 70% of accommodation costs above the entry threshold, up to a maximum amount, which varies according to geographical location.
New Zealand	Accommodation Benefit for Students	National/Federal	for rental and housing costs	Rates vary by geographic area, and are not determined on an individual's rent costs. However, geographical payments are determined by the cost of an average room, which is derived from rent information.
New Zealand	Emergency Housing Special Needs Grant	National/Federal	for other housing costs	The benefit covers the actual and reasonable costs of emergency accommodation.
Norway	State housing allowance (<i>Bostøtte</i>)	National/Federal	for rental and housing costs	For private housing, the housing allowance is calculated as 73.7% (in 2018) of the difference between maximum accepted housing expenses and a share of "own expense". The own expense is calculated on the basis of taxed income and assets. The maximum housing expenses accepted for the purpose of calculating the housing allowance are defined based on location and household size (increased allowance for high-cost areas).
Poland	Housing allowance (<i>Dodatek mieszkaniowy</i>)	Municipal	for rental and housing costs	The housing allowance covers the difference between what is considered a reasonable payment for a family and actual housing costs. Housing costs cannot exceed a maximum amount, calculated based on the size of the family and the size of the dwelling. Rental cost, maintenance costs, as well as charges for heating, water, and collection of liquid waste are all taken into consideration. Decision on whether applicants are eligible to receive the benefit are made by the head of municipality (mayor).
Portugal	<i>Porta 65 - Jovem</i>	National/Federal	for rental costs	The amount of benefit depends on income and household composition. It is only possible to benefit from Porta 65 Jovem for 5 years.
Portugal	NRAU Subsidy, Law n. 6/2006 (<i>Novo Regime Arrendamento Urbano</i>)	National/Federal	for rental costs	The amount depends on rent costs, the household's income and size.

	Measure Name	Administration level	Type of costs covered	Amount depends on
Slovak Republic	Housing allowance (<i>Príspevok na bývanie</i>)	National/Federal	for rental and housing costs	The amount depends on household size/composition.
Slovenia	Housing benefit (<i>Subvencija najemnine</i>)	National/Federal	for rental costs	The amount is based on the actual rent paid by a household up to a maximum, which varies by household size. The claimant must pay 20% of the rent. If the claimant's ability to pay is less than 20% of the rent, they are entitled to rent subsidy of 80% of the rent.
Sweden	Housing allowance (<i>Bostadsbidrag</i>)	National/Federal	for rental and housing costs	Housing allowance targets families with children and young adults (18-28 years old). Housing allowance is means tested. The amount of the allowance depend on the income, the housing costs and the composition of the household (e.g. the number of children). The allowance decreases when the annual income exceeds a certain limit. The income limit varies between families and young adults and also between single and cohabiting households. Housing allowance is paid for a part of the housing costs between a lower and upper limit. For families the upper limit varies with the number of children in the household.
Sweden	Housing supplement for pensioners (<i>Bostadstillägg för pensionärer</i>)	National/Federal	for rental and housing costs	The amount is calculated based on income level.
Switzerland	Housing subsidy (<i>Zusatzverbilligung ZV</i>)	Joint (cantons verify eligibility; federal disburses payment)	for rental and housing costs	The amount depends on income level, household size/composition, and size/conditions of dwelling.
United Kingdom (9)	Housing Benefit	National is responsible for scheme and funding; local for day-to-day administration	for rental costs	[NB: The housing benefit will be replaced by Universal Credit.] Amount depends on tenure, as well as rent costs and dwelling size, household age, income and size/composition.

	Measure Name	Administration level	Type of costs covered	Amount depends on
United Kingdom	Discretionary housing payment	Local government	for rental and housing costs	The amount is at the discretion of the local authority; it depends in part on the size, characteristics and occupancy of the dwelling.
United States	Housing Choice Vouchers	Joint	for rental and housing costs	Dwelling must pass health and safety inspection to be eligible for subsidy. Amount depends on household income and size/composition, as well as rent costs and size/conditions of the dwelling.
United States	Low-Income Home Energy Assistance Programme	Joint	for other housing costs	The amount is based on household size/composition and energy costs.

1) Information for Bulgaria, Croatia, Cyprus, Japan (public assistance measure), Lithuania (Compensation for part of lease payment) refer to 2016 OECD Questionnaire on Affordable and Social Housing (QuASH). Information for all other countries refer to 2019 OECD QuASH. Supplemental information was also taken from the country policy descriptions in the OECD Tax-Benefit Database (www.oecd.org/social/benefits-and-wages/).

2) Australia: Some states/territories provide additional housing allowances. For example, New South Wales provides "Rent Choice", a time-limited cash transfer, paid directly to the landlord, to help disadvantaged individuals sustain a tenancy in the private rental market.

3) Canada: No currently active national housing allowances. However, the forthcoming Canada Housing Benefit (active from April 2020) will provide cash support to low-income tenants in social rental and privately rented housing.

4) Chile: Housing allowance is contingent to the availability of funding. In Chile, allocation is defined based on a point system prioritising: households with children and/or persons with disabilities; persons who have done military service; victims of political persecution; individual/households who have repeatedly applied for support.

5. Cyprus: a) Footnote by Turkey: The information in this document with reference to « Cyprus » relates to the southern part of the Island. There is no single authority representing both Turkish and Greek Cypriot people on the Island. Turkey recognizes the Turkish Republic of Northern Cyprus (TRNC). Until a lasting and equitable solution is found within the context of United Nations, Turkey shall preserve its position concerning the "Cyprus issue"; b) Footnote by all the European Union Member States of the OECD and the European Commission: The Republic of Cyprus is recognized by all members of the United Nations with the exception of Turkey. The information in this document relates to the area under the effective control of the Government of the Republic of Cyprus.

6) Germany: The municipal level is responsible for the administration of the benefits. The supervision for Hilfe zum Lebensunterhalt on the state level and Grundsicherung im Alter und bei Erwerbsminderung on the federal level.

7) Greece: With respect to these benefits, national level is responsible for planning, monitoring, evaluation and funding; municipal level is the entry-point for submitting applications.

OECD Affordable Housing Database – <http://oe.cd/ahd>

OECD - Social Policy Division - Directorate of Employment, Labour and Social Affairs

8) The statistical data for Israel are supplied by and under the responsibility of the relevant Israeli authorities. The use of such data by the OECD is without prejudice to the status of the Golan Heights, East Jerusalem and Israeli settlements in the West Bank under the terms of international law.

9) United Kingdom: Information on housing benefits presented in this indicator covers the entire United Kingdom, with the exception of Northern Ireland.

Source: OECD Questionnaire on Affordable and Social Housing (QuASH, 2019); country policy descriptions in the OECD Tax-Benefit Database (www.oecd.org/social/benefits-and-wages/).