

2021-2022 New York State Rental Supplement Program Plan

District: Delaware County

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RSP Implementation Date: TBD

Indicate whether the program will be administered using district mechanisms (e.g., direct administration or transfer of funds to county agencies) or by another public agency, contractor or non-profit organization. Administration of the RSP may be delegated in full or in part. Also indicate whether districts will coordinate with the local HUD-funded Continuum of Care, if applicable.

Delaware County Department of Social Services will transfer funds, in their entirety, for the Rental Supplemental Program to Delaware Opportunities Inc., a local non-profit that not only works closely with DSS and the homeless shelter, but also manages the county's DV shelter as well as provides Section 8 Rental Assistance, STEHP, ESGCV and ERAP assistance, as well as oversees the county's food pantry network and many other critical emergency services and supports. Delaware Opportunities works closely with the regional HUD-funded Continuum of Care as a member of various networks and committees (most recently having served as a Board member).

Indicate the anticipated RSP supplement amount and the number of households expected to be served in the initial 12-month period. RSP supplement amounts are set at 85% of the local Fair Market Rent (FMR) values with a district option to pay up to 100% of FMR using local funds.

RSP Supplement Amount: **\$121,902**

Household Size	Allowable Number of Bedrooms	100% FY2022 HUD FMR	85% FY2022 HUD FMR State Reimbursed	Max Supplement Amount	District Funded Amount
1	1	\$651	\$553	\$553	\$0
2	1	\$651	\$553	\$553	\$0
3	2	\$757	\$643	\$643	\$0
4	2	\$757	\$643	\$643	\$0

Anticipated Number of Households to be Served:

Delaware Opportunities anticipates serving up to 20 households/individuals who are experiencing homelessness and up to 30 households/individuals who are at risk of homelessness. Support will assist families with rental assistance, back rent, as well as security deposits. Monthly rental supplements will vary based on the rental need determined by family size. Delaware Opportunities proposes the subsidy of 85% of the Fair Market Rent, working closely with other agencies and internal programs to make every effort to assist with covering the additional 15% when a person is unable to report any income.

Describe the outreach mechanisms that will be used. Receipt of TA is not a requirement for determining eligibility for the RSP, but at least 50% of the supplements shall be allocated for households who are currently in shelter or experiencing homelessness (unless sufficient demand does not exist for such households within a district).

Delaware Opportunities (DO), as described above, works very closely with DSS and the staff managing the homeless shelter as well as oversees and directly supports the county's DV shelter. In addition, DO works closely with many homeless and/or low-income individuals and families through all of its agency programs and services. Outreach usually occurs in the form of referral, whether it be from DSS to DO or via one of the many other agency programs/services or other community partner agencies who may have clients in need of services. Additionally, DO employs three Homeless Advocates, a Supplies for Life Advocate, and an Agency Advocate, all of which work in the office as well as in the field to connect with and support clients. Staff can often be seen out in the field meeting with clients to help build a rapport and connect them with needed services, which usually starts around housing and food. COVID has brought with it a significant increase in the number of homeless individuals and families the agency is serving. Due to lack of available rental units, as well as other factors, it has been increasingly difficult for the county's most vulnerable residents to secure safe, affordable, and sustainable housing. Current funds in STEHP and ESGCV, in particular, are either running low or are already obligated to other individuals in need. There is need for additional funds (like these) to be able to help even more individuals and families in need.

Describe the application and determination process, including the length of time within which applications will be approved or denied. OTDA encourages districts/contractors to make decisions regarding applications within 30 days of the application date.

Individuals and families working with Delaware Opportunities, whether existing clients or new clients referred for services, will complete a programmatic intake/application with a Homeless Advocate. All documents and income will be collected at that time. If needed documents are not available, staff will provide additional time and/or work with clients to gain access to the required documents. Eligibility for services is determined at intake or when all documents have been received following intake if additional time was needed, no later than 30 days from the date of intake. During intake, all income documentation is requested. We utilize an excel spreadsheet to then determine eligibility and the determination is made at that time. Internally, we have the expectation that this gets done as soon as possible and no later than 30 days.

Describe the forms and/or notices that will be used to facilitate the application and determination process. When households requesting a supplement do not meet the criteria established by the district, the denial/discontinuance letter must support the decision by explaining the criteria and the district's decision that the household does not meet such criteria. When a supplement is approved, an award letter must be provided to both the tenant and landlord and must detail the amount approved to be paid on a monthly basis and the months/term included.

Delaware Opportunities currently administers both the STEHP and ESGCV programs for the county and will institute the same processes and procedures, as well as paperwork, for this RSP program as well. Denial letters, landlord and tenant letters, etc. are all established for STEHP and ESGCV and will be modified to reflect the program requirements for the RSP program.

Indicate the anticipated target population, including prioritization of certain households (e.g., those with children under the age of six, single individuals, veterans, individuals and families experiencing domestic violence (DV) and non-DV victims of violence). Eligible participants include individuals and/or families, regardless of immigration status, who are experiencing homelessness or facing an imminent loss of housing, including individuals and families with or without children.

Delaware Opportunities clients are currently served on a first come/first served basis for many programs. However, there are some programs that do prioritize certain eligibility criteria. For this RSP program, priority will be given and extra effort will be taken to assist those individuals and households from the categories listed above. However, Delaware Opportunities strives to serve any and all clients who come in with a need, particularly those that are homeless or facing homelessness.

Indicate how the following eligibility standards will be met:

- **Households must earn no more than 50% of area median income (AMI) at the time of application (using current monthly income for the household and excluding earned income of a minor child; adoption/foster care payments; one-time loans, gifts, lump sum payments or other non-recurring income; and childcare subsidy payments) based on location and household size, with initial priority given to households who earn no more than 30% of AMI;**
- **A household's financial contribution will be limited to 30% of their households' total earned and/or unearned income; and**
- **Supplements are to be provided until the household's income reaches 30% or more of their monthly rent, at which point the housing will be considered affordable for the individual/family and the supplement will end.**

Delaware Opportunities staff work with the client, at intake, to calculate income eligibility for any program that may be able to assist them. Delaware Opportunities will prioritize those with an AMI of 0% - 30%. When we are programmatically nearing the fourth quarter of the year, we can then assist those between 31% - 50%. Those who are at 30% or above at the time of recertification will be encouraged and supported in applying for Section 8 Rental Assistance or other sustainable long-term supports. Homeless Advocates and the Agency Advocate work closely with the Housing Department, which administers the Section 8 Rental Assistance program, to utilize their HAPPY system to help determine calculated subsidy amounts based on income information. The HAPPY system is our HUD's Section 8 data system. They use this to determine subsidy amounts based on household size, type, income, and other demographics. Because they have this system in place, we are able to utilize it to help us determine calculations for subsidies in a more formal manner for other programs we have like STEHP, ESGCV, and now RSP. Clients are required to recertify at various points in time, depending on funding streams, to redetermine eligibility. For this funding, it is proposed that clients would recertify after 3 (near homeless)/6 (homeless) months. For those that are near homeless, we would recertify every three months. We used this timeframe as it is consistent with some other programming we have, such as STEHP. For those that are homeless, we would recertify every six months. While some of other programs allow for recertification every 12 months, we felt that with this "special" bucket of funds we would like to recertify every six months to make sure we were prioritizing and continuing to priority those at 30% AMI.

List any other established eligibility criteria and indicate how each criterion will be determined and documented. Include the following:

- **Will leases be required of all tenants?**
- **How will the district/contractor ensure that the rental costs are legitimate and the responsibility of the recipient if a lease is not required?**
- **Will there be any health and safety standards regarding the housing that must be met prior to paying the supplement at a specific location?**
- **How will the district handle modifications (e.g., moves, rent increases, changes in household composition, etc.)?**
- **What standards will be followed in determining whether supplementation will continue following a move?**
- **Will the district/contractor require the recipient household to report changes related to the supplement within a set timeframe as a condition of continued eligibility for the supplement?**
- **How will contributions towards rental costs from individuals outside the household be verified and what standards will be applied in determining whether such contributions can be sustained in the future?**

All Delaware Opportunities supported individuals and families will be required to enter into a lease with a landlord. DO utilizes a generic lease that can be used in circumstances where a landlord may not already have something more formal in place. Homeless Advocates and other DO staff work to ensure that rental units are rent reasonable and meet fair market rent values. There is currently an inspection process in place for both STEHP and ESGCV which would be utilized for this new program as well. This inspection process also prepares clients for meeting Section 8 guidelines should the long-term plan be to help them get enrolled in Section 8 rental assistance.

Clients are required to indicate anyone that has moved in or out of the house, changes to income, etc. This notification must occur timely and within 10 days of the change, at a monthly follow-up if that comes first or at the time of the recertification. These changes are done almost immediately. Dependent on caseload and staffing that may impact the timeliness but the goal is as immediately as possible. All cases are discussed at weekly case reviews so rarely would changes go unmade for longer than that period of time.

We do have clients sign a confirmation ("obligation letter") that states they are required to inform us of any outside contributions or changes to income or household status within ten days. The Homeless Advocate who works with that client would speak with them about the contributions and determine whether it was a one-time contribution versus something more sustainable.

Delaware Opportunities does not currently have a procedure in place for modifications related to moves but does follow Section 8 guidelines as it relates to rent increases and changes in household composition. A procedure will be developed upon implementation of this program to address how to handle moves, anticipating it will similarly follow Section 8 guidelines. Guidelines will also be created modeled from Section 8 regarding contributions toward rental costs, requirements for notification of changes, etc.

Indicate the length of time the supplement will be offered to households (e.g., three months, six months, indefinitely, etc.) and whether there is a recertification process for the supplement.

Delaware Opportunities individuals and/or families eligible for Rental Supplement funds will continue to receive rental support if the household's income does not increase to a point at which their rent is 30% or less of their total monthly income, the household may still qualify for the supplement as long as there are no other factors that make them ineligible. The goal will be to help these individuals and families enroll in Section 8 rental assistance but should they not be interested, willing, or unable to qualify for some reason, the RSP funds can continue to support them. RSP recertification will occur at 3 months (for near homeless) and 6 months (for homeless).

Indicate the payment mechanism (e.g., check, transfer of funds, etc.) and whether the supplement will be paid to the tenant or the landlord.

Payments for rental subsidies are facilitated in-house by the agency's Fiscal Department, in the form of a check made out directly to the landlord. These payments are issued to landlords at the beginning of each month. Delaware Opportunities has an established relationship with many of the county's landlords and has staff skilled with developing these types of relationships with new landlords, when needed, and can help to navigate this process with clients.

Indicate how fraudulent and/or cases determined to otherwise be ineligible will be handled, including the procedure for recouping funds, if necessary.

A procedure for terminations, denials, etc. is established for current streams of funding and can be modified for this program as well. The program staff work closely with the agency's fiscal department to void checks, issue stop payments, navigate notifications related to payments, when necessary, etc. It may also include letters sent to landlords and/or clients asking for a return of funds and a process for how and when that needs to occur. In extreme situations, the agency can consult with their attorney to navigate the recoupment of funds, particularly when fraudulent cases are involved.

Appeals Process

Program participants that have been terminated have 30 days to appeal the termination if they disagree with the decision. Appeals can be provided in writing and a decision, in writing, will be provided in no more than 30 days from receipt of the appeal request.

Describe how the district/contractor will ensure that households do not receive duplicate benefits from other sources that may assist with paying future rent/ongoing rental supplements.

Delaware Opportunities currently utilizes the HMIS data system for the work being done for the STEHP and ESGCV programs. Additionally, RSP program staff will work closely with the agency's Housing Department to utilize their Happy system, which assists with income eligibility determinations, fair market rent information, etc. Staff also work closely with DSS's Welfare Management System to identify clients who may already be receiving other types of public assistance. Staff obtain a signed release from clients to be able to work with DSS for them to give us this information. If it is within the agency, the Homeless Advocates and the those in the Housing Department meet regularly to discuss shared clients, etc. Often clients first entering into the agency filter through STEHP and related services before they are enrolled more permanently on Section 8 rental assistance. We also have an agency wide database where all client intakes go and this allows us to look up and verify what services individuals are receiving and when.

Indicate how client records will be maintained (e.g., paper file cabinets, electronic combination of both) and whether any specific software or system will be used. Notifications regarding eligibility determinations (e.g., approvals, denials and discontinuances) must be maintained in the case record for a minimum of six years following submission of the final expenditure report.

Delaware Opportunities keeps all client records on file, in individual folders, with all documentation pertaining to that individual or family's case. In some cases, some documents may also be received and/or stored electronically in the same manner. Additional client information is also stored in the HMIS data system. No different than any other programs, our financial records are kept in an accounting software program with hard copy backups that can be provided upon request and are retained according

to a robust records retention policy for the agency. Same with client files. Clients files are maintained in hard copy as well as some documents that can be stored for longer periods of time on our agency servers. While access cannot really be granted per se, any documentation can be provided upon request within 24 hours. All files are locked with restricted access.

All files related to this programming, similar to STEHP and ESGCV, will be securely stored and retained for a minimum of 6 years.

Indicate how the progress of those served in the RSP will be monitored. Reports that describe the progress of RSP activities and those served will be required on at least a quarterly basis. A report template will be provided. Minimally, reports must include the amount of rental supplement payments provided, the number of households served and certain demographic information including receipt of TA and household composition.

Delaware Opportunities has a variety of reporting and tracking mechanisms in place for all programming. RSP staff will prepare case notes specific to each individual household as well as prepare monthly Board reports, financial spend down reports, and reports utilizing the HMIS data system. The data from these reports collectively will make up what is required for the quarterly reports.

To the fullest extent possible, RSP funding should not be used to supplement existing Shelter Supplement Programs. Districts who currently have an approved Shelter Supplement Plan must indicate the following:

- **How the RSP will be different from their current approved Shelter Supplement Plan**
- **The process established to ensure funds are not duplicated**
- **How participating households will be distinguished**

NA