

2021-2022 New York State Rental Supplement Program Plan

District: Orange County

Contact Person: Terri Torchio, Director of Economic Independence

Telephone: (845) 360-0241

Email: terri.torchio@dfa.state.ny.us

RSP Implementation Date: XX/XX/XXXX

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.

The program will be administered directly by the Orange County Department of Social Services in full. The OCDSS will coordinate with the Orange County Continuum of Care in administering this program.

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: *60 households or up to \$1250 per month per household*

Anticipated Number of Households to be Served: *60*

Household Size	Allowable Number of Bedrooms	100% FY2022 HUD FMR	85% FY2022 HUD FMR State Reimbursed	Max Supplement Amount	District Funded Amount
1	0/ Efficiency	\$1033.00	\$878.00	\$878.00	\$0
2 to 3	1	\$1107.00	\$940.95	\$940.95	\$0
4 to 5	2	\$1412.00	\$1200.20	\$1200.20	\$0
6 to 7	3	\$1796.00	\$1526.60	\$1526.60	\$0
8	4	\$2022.00	\$1718.70	\$1718.70	\$0

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).

All homeless persons who are sheltered in Orange County are entered into HMIS and Coordinated Entry. OCDSS will coordinate with the COC to prioritize applicants who are currently in shelters, warming stations, and hotels where applicable. We will also coordinate with SPOA to outreach to those on their wait list. OCDSS will use our existing THA (Temporary Housing Assistance) roster to identify potential applicants, as well as HMIS, which is populated with the demographics of all homeless individuals being sheltered in Orange County. We will provide outreach to street homeless, and homeless residing in warming stations by partnering with agencies in our COC that provide street homeless services. The COC includes most of the non-profit entities that work with the homeless, or at risk of homeless in Orange County. They will be given detailed information about the program and will have the ability to refer those at risk of homelessness, as well as the currently homeless. We will also post information on the Orange County Government website and provide outreach using social media messaging.

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.

Applications will be available both online and as a paper application. The application will be available on the Orange County Government website and will be provided either by paper or link to the online application to non-profit agencies who work with the homeless and those at risk of homelessness. We are contracting with outreach workers who will provide assistance in filling out the application if necessary. Outreach will also be done via social media and Applications will be prioritized based on homeless status and AML. Our 311 hotline will also be briefed on how to access the program. Training will be provided to our in-house staff from both adult and children services, as well as to our homeless housing providers and other non-profits working with those at risk of homelessness. Decisions regarding applications will be made within 30 days of application date.

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.

Forms will include the application, award letters for both landlord and tenant that includes the amount approved with the time period (6 months) included. Additional forms will include a shelter verification form, a denial letter which will support the district's decision and reason for denial when the applicant does not meet program criteria. Letters will be provided whenever there is a change in benefit, such as an increase or reduction of the tenant's contribution, or case closure. A letter will be generated after recertification to indicate if there are changes or if the supplement will remain unchanged. An application checklist will be used internally to facilitate determinations.

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.

Priority will be given to households who are currently residing in temporary housing and others currently experiencing homelessness. Further prioritization will be determined through the use of a Vulnerability Index, which will be created to identify applicants who are particularly at risk, including families experiencing domestic violence, veterans, people with physical and mental health challenges, and those with a household income of under 30% of AMI.

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.

Eligibility will be determined through documentation of earned income, unearned income and household composition. The household's financial contribution will be documented and limited to 30% of their household's income until their income is such that the shelter cost is 30% or less of their gross income.

In the event that the tenant fails to pay their portion of the rent for two consecutive months, a review of the case will be completed and may result in the loss of the supplement. In addition, if the tenant loses all income, they will agree to apply for Temporary Assistance and comply with program requirements if eligible. This

requirement may be waived on a case-by-case basis if the tenant has a viable plan to obtain other income.

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?

Leases will not be required. The district will ensure that rental costs are legitimate by requiring that the landlord complete a shelter verification form and obtain a W-9 to accept payment. The district will not conduct property inspections, but payments to the landlord will be discontinued if the unit is condemned. Tenants will be required to report changes (such as changes to household composition) within 10 days of the change. Responses to changes in circumstance may include changes to the tenant share of the rent or case closure. These changes will not be implemented until 30 days after the change is verified. Failure to report may result in the loss of the supplement. Contributions toward rental costs from individuals outside of the household will be verified through obtaining proof of their income, and a notarized letter outlining their intention to continue contributions until the unit is sustainable by the household's income. The supplement can be continued after a move if the move is to a more affordable unit.

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.

The supplement will be offered to households for an initial period of six months, with a recertification after six months of the initial approval date. The recertification will determine if the household remains eligible for the supplement.

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

Payment will be made through QuickBooks and will be a paper check paid directly to the landlord.

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

If there is a discrepancy and the tenant is a TA recipient, the case will be referred to the Special Investigations Unit. If the tenant is not a TA recipient, any discrepancies would be reviewed, and the supplement ended if discrepancies are not resolved. To determine fraud in case receiving rent supplement they would need to also be eligible and receiving Temporary Assistance. It will be through the TA case that we would be able to establish fraud utilizing our system data to determine suspicion of fraud and referring the case to our Special Investigation Unit (SIU). If SIU determines fraud, they will follow all procedures. The recipient will be notified that rental supplement benefit will end in 30 days.

For non-TA eligible rental assistance recipients, if during our six-month review of eligibility, we find discrepancy or income changes that impact their eligibility for rental assistance, they will be notified that rental assistance benefit will terminate in 30 days. We would not have the tools / data available to determine "fraud". Our eligibility review will be based on recipient income reporting through documentation of earned income, unearned income, and household composition.

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.

The district will ensure that households do not receive duplicate benefits from other sources by using databases available to us. These may include HMIS, WMS, ERAP client-level data, and monthly coordination with other stakeholders in the Orange County Continuum of Care who provide rental supplements.

Indicate how client records will be maintained (e.g., paper file cabinets, electronic records, or a 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.

Client records will be maintained through a combination of electronic and paper files, with electronic files being the preferred method of storage. Files will be stored in our electronic document system (Docuware) and maintained for a minimum of six years. While HMIS does not have the functionality to maintain supporting documentation, it does maintain client demographic information indefinitely.

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.

Progress will be monitored using the report template that is provided. It will include the number of supplements provided; amount of program dollars drawn down as well as any other demographic information that is requested.

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

RSP funding will not be used to supplement households receiving existing approved shelter supplements. RSP is different from our current approved shelter supplements as the supplement will be based on AMI and the household contribution of 30% of their gross income rather than shelter allowances. Households currently receiving a shelter supplement will be identified by a review of WMS. TA applicants will be assessed on a case-by-case basis to determine if a TA shelter supplement will be sufficient for the applicant to maintain housing. If it is determined that it would not be sufficient, the TA examiner will refer the applicant to the RSP program.