

## 2021-2022 New York State Rental Supplement Program Plan

**District:** Oswego County  
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**RSP Implementation Date:** TBD pending approval date of plan

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.

Oswego county will directly administer their RSP allocation. The district currently works closely with their regional CoC and will coordinate needs and services with them through their already established HMIS and Coordinated Entry System.

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:

Oswego County will set their maximum RSP amount based on the current established FMR and Occupancy Standards being used by their county HUD program.

Household Size	Allowable Number of Bedrooms	100% FY2022 HUD FMR	85% FY2022 HUD FMR State Reimbursed	Max Supplement Amount	District Funded Amount
HOH HOH, Spouse/Cohabitant	1	\$781	\$664	\$664	\$0
HOH, 1 child/adult HOH, 2 children/adult  HOH, Spouse/Cohabitant. 1 child/adult  HOH, Spouse/Cohabitant, 2 children/adults	2	\$966	\$821	\$821	\$0

HOH, 3 children/adults	3	\$1198	\$1018	\$1018	\$0
HOH, 4 children/adults					
HOH, Spouse/Cohabitant, 3 children/adults					
HOH, Spouse/Cohabitant, 4 children/adults					
HOH, 5 children/adults	4	\$1390	\$1182	\$1182	\$0
HOH, 6 children/adults					
HOH, Spouse/Cohabitant, 5 children/adults					
HOH, Spouse/Cohabitant, 6 children/adults					

**Anticipated Number of Households to be Served:** Based on the above figures and the allocated amount for Oswego County minus Admin costs, we anticipate being able to serve 35 households annually as long as funding continues. This number could fluctuate based on the amount of time households remain eligible.

**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).**

Oswego County currently sits on the CoC Advisory Council as well as co-sharing their local subcommittee on housing, COACH. Utilizing established coordinated entry processes, Oswego County will be able to identify potential candidates for RSP. Oswego County also works closely with our 2 local small shelters as well as our Warming Center during Code Blue periods to also assist in identifying households who are currently in shelters or experiencing homelessness. Through partnerships with community nonprofits such as Catholic Charities, Salvation Army and Oswego County Opportunities, hired temporary staff will provide outreach and education via sources such as email list serve, press releases, flyers, and social media.

**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.**

Oswego County will utilize currently established coordinated entry processes through our CoC to identify individuals who are in need of assistance. Oswego County has created a simplified intake/assessment form that will be completed with the household via phone or face-to-face. Because we will be administering these funds through the agency, we will be able to coordinate RSP payments with other available resources to the households. All applications for RSP will follow the OTDA standard timeframe of 30 days. Applications that have an emergent need will be processed sooner to prevent homelessness, when appropriate.

**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.**

Oswego County has created an acceptance, denial and discontinuance letter that will be provided to all households applying for RSP assistance. All paperwork will be maintained in a case record for the household for reference and audit purposes.

**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.**

**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.

Oswego county will provide RSP to all eligible households regardless of immigration status who are experiencing homelessness or facing an imminent loss of housing. Based on current HMIS data from 2021 – Oswego County served 658 homeless households of which, 409 were adults without children and 84 of those households were adults between the ages of 18-24. We also served 144 children; 59 were under the age of 6. Within our homeless population, 116 individuals attested to Domestic Violence concerns, 51 indicated they were chronically homeless and 38 identified as being recently released from incarceration. Based on our numbers, Oswego County will prioritize households containing adults without children who meet the above criteria. These populations can be faced with greater risk, if not connected to stabilized housing to assist in preventing further barriers to self-independence. Although these populations would be considered a priority, all eligible households will be served as long as funding is available.

Oswego County will require households to submit and verify their current month's income in order to determine eligibility under the 50% AMI guidelines. Households will be provided information in their acceptance letter about the need to report any changes to income so staff can monitor their income to rent ratio for continued eligibility.

**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?**

At minimum, a 6-month lease will be required for tenants/landlords who are eligible for RSP payments. Households will be reassessed in the 5<sup>th</sup> month of their eligibility for an additional 6 months of payment. Staff will coordinate continued 6-month lease options with the landlord at this time.

**• How will the district/contractor ensure that the rental costs are legitimate and the responsibility of the recipient if a lease is not required?**

Hired staff will verify and document rent responsibility with the landlord. Landlords will be required to have an established vendor relationship with the agency and payments will be made directly to them during the eligibility period.

**• Will there be any health and safety standards regarding the housing that must be met prior to paying the supplement at a specific location?**

Staff will complete a habitability checklist that mirrors the one used for our ESG funds for individuals/households who are eligible for RSP payments.

**• How will the district handle modifications (e.g., moves, rent increases, changes in household composition, etc.)?**

Households are required to report changes in the household's status to the agency within 10 days of the change to ensure timely changes in payments or eligibility are made. Once received, the agency will determine if the household remains eligible with the changes and will make adjustments to the RSP amount and/or eligibility, as needed.

**•What standards will be followed in determining whether supplementation will continue following a move?**

A reassessment of the household's income and the income/rent ratio will be conducted when an individual relocates in order to determine ongoing eligibility. If the household is no longer eligible, a letter of discontinuance will be provided.

**• 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?**

Yes, the RSP acceptance letters created by the agency informs the household that they must report changes within 10 days.

**• 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?**

A self-independence plan will be completed with the household at intake to identify sustainability of ongoing payment once RSP has concluded. Collateral contracts will be made with landlords quarterly to verify additional contributions towards rent. Households will be informed that they should report any changes (such as being in receipt of HUD) within 10 days.

**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.**

A household's eligibility for RSP will be authorized on a 6-month basis with reassessments being conducted in the 5<sup>th</sup> month of the authorization period. A household can remain eligible for RSP until their income reaches 30% or more of their monthly rent or until funding ends.

**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 authorized by the agency will be handled through our MUNIS system through check issuance to landlords directly.

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

Households that are suspected of being fraudulent or otherwise ineligible will be referred to our investigative unit. If there is supporting information and documentation that payments were made fraudulently, the monies paid will be referred to our accounting department for collection. The findings of the investigation will determine who will be responsible for repayment of the funds. The agency currently has an established billing process which will be followed in these situations if the landlord and/or client do not return the monies received in full. In situation where an erroneous payment was made on the client's behalf, the agency will request that the money be returned to the agency and if not returned, will be deducted out of future payments to the vendor.

**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.**

Direct administration by the agency will assist with ensuring that households are not receiving duplicate benefits from other sources. Co-locating staff with other housing program staff increases communication across programs. Staff also have access to agency systems, including HMIS, to assist in identifying if individuals are currently or have in the past received funding from other programs.

**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.**

All individuals participating in RSP will have their information input into HMIS for CoC data purposes. Client records will also be maintained in paper format in a file cabinet designated for RSP folders for the required record retention timeframe of 6 years. Oswego County is currently in the process of contracting with an outside agency for electronic record storage for cases not supported by IEDR. Therefore, if this program becomes available for use with RSP, we will transfer files over into an electronic format.

**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.

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  
NA
- The process established to ensure funds are not duplicated  
NA
- How participating households will be distinguished  
NA