

2021-2022 New York State Rental Supplement Program Plan

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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.

Program will use direct administration to bring households online quickly. Direct work with the CoC is part of the program plan with Coordinated Entry participation critical to program operation. JCDSS currently writes and administers the grant for Coordinated Entry for our CoC, we are heavily involved with that program and all CoC committees.

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: \$402,505

Anticipated Number of Households to be Served: 45

The district expects to use the full administrative amount of \$60,375 (15%) annually. This will fund a new Caseworker position to administer the program and provide supportive services/casework with RSP households as needed. This plan leaves a balance of \$342,130 available for rental subsidy assistance. Our agency currently administers a HUD/CoC rental subsidy program that would serve similar households and can go up to the full FMR. The average monthly subsidy in that program (Transitional Shelter Plus Care) for a household is \$645/mo. Looking at the available subsidy, we have an average of \$28,511 to spend monthly for assistance-using the avg. subsidy amount for the similar program that would allow us to assist approximately 44 households each month. Rental subsidy and # of participant households will be closely tracked, we expect to have reliable data regarding subsidies and households served by the end of the 2nd year. We feel this initial estimate is realistic based on our work with other housing programs, but certainly understand that this is currently a best guess estimate & will be closely tracked but could be different as the program rolls out. Table of Household size/bedrooms allowed/FMR/& Supplement follows:

<i>HH Size</i>	<i>Allowed # Bedrooms</i>	<i>2022 FMR 100%</i>	<i>2022 FMR 85%</i>	<i>Max Supp Amt</i>	<i>District Funded Amt</i>
1	1	\$899	\$764	\$764	\$0
2	1 or 2 if child in HH	\$1183	\$1006	\$1006	\$0
3	2	\$1183	\$1006	\$1006	\$0
4	2 or 3 depends on age/sex children	\$1587	\$1349	\$1349	\$0
5	3	\$1587	\$1349	\$1349	\$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).

Currently the Coordinated Entry listing includes all households in emergency housing as well as households meeting the HUD definition as homeless not in emergency housing. The CE list also includes households needing assistance with homeless prevention. Outreach will be provided by a new agency Caseworker to administer the supplement and will be based primarily on homeless status and consideration of other possible housing options.

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.

We are planning to use the Coordinated Entry Assessment to serve as the initial tool to determine what programs a household is eligible/appropriate to apply for. We would like to add the RSP program to our current array of housing assistance options available in Jefferson County. The assessment is not an application for a specific program but once assessed households would receive information regarding the programs where they qualify. These options might include PSH; EHV; PHA subsidized; Section 8 HCV's; RSP or other locally available programs ex. BEST. Once a household decides to apply for RSP as the best option--a determination will be made within 30 days. Program will not accept applications when there is not funding available to add additional households (no wait list).

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.

All forms for the RSP program will mirror the forms/notices currently used for the Permanent Supportive Housing program that our agency administers. Award letters and regular communication with households will use the same forms/processes-modified for the RSP program. This program will be very similar to a PSH program but focused more on the rental subsidy vs. intensive supports for the household. Referral for community-based supports can also be provided as part of the process but wouldn't be required. The screening/assessment process should ensure that households are eligible prior to their applying for any assistance program but if it were to be determined after the fact-the denial information would explain why; as well as being documented as discussion with the household prior to any letter being issued. All award payment information will be provided in writing to tenant & landlord with copies kept in the case file. We regularly issue this type of correspondence with the PSH 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.

Through Coordinated Entry currently HH with children; veterans; households over 60 or under 24; DV; or disabled are already prioritized as part of the assessment process. Additionally, we would like to target HH that are in emergency housing or HUD homeless that have stable earned/unearned income that are rent burdened and need the supplement to stabilize and are ineligible for traditional assistance through programs. Ineligible for Section 8 or PSH programs that require a qualifying disability etc. These households tend to struggle to get out of emergency housing once they are placed.

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.

All income calculations, eligibility criteria, annual recertification, ongoing verification of income will be done in line with current PSH/ESG project requirements through HUD. These RSP requirements for calculation of income/hh contribution towards rent are in line with existing program formats. We anticipate being able to provide quarterly check ins with households in addition to annual recertifications. All adult household members, including SSI recipients or ineligible aliens, must contribute 30 percent of their gross 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 be required of all tenants/HoH and copies will be maintained in RSP files.

All RSP units will be required to pass inspection using CoC minimum housing standards, HQS standards ideally. (attach CoC minimum standards) Moves, income changes, rent changes, household changes will be handled using the same standards as the current HUD CoC PSH programs. Including continued eligibility following a move or other change(s). Standards for continued supplement will be determined based on affordability and compliance with program requirements.

Recipients will be expected to report changes timely to maintain eligibility (10 days); however, stability of housing will remain a priority when considering time frames/processing of any changes.

Any contribution towards rent made by individuals outside the household will be verified by statements, rent receipts and/or landlord verification.

Standards used in determining whether such contributions can be sustained in the future will be evaluated; changes in contribution from those outside of the household will be verified at annual recertification. It will be expected that changes related to these contributions would be reported timely (10 days) outside of the annual recertification.

All written communication with households and landlords will be copied to the household file. Forms for households, landlords for notifications, calculations, rights/responsibilities, annual recertifications etc. already exist for ESG and PSH programs and these forms will be modified as necessary for RSP project.

All case information from assessment/intake through transition/termination will be maintained with the case through forms/notifications/progress notes.

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.

Household contribution amount will be a maximum of 30% of gross income. Once a household reaches the point where the rent is less than 30% of gross monthly income, they will transition off of the RSP program. Otherwise, the Supplement will be available indefinitely as funding permits; annual recertification will be required. Anticipated contact with household quarterly to review current status for income/household composition. Also, annual outreach to LL regarding program in advance of recertification. Annual written notification of continued program eligibility/subsidy amount provided to both HH and LL with copies kept in agency file.

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 to be made directly to the landlord with required paperwork/documentation. Preference is for electronic transfer of funds but would be dependent on agency processing abilities as well as landlord ability to receive eft's. If agency or landlord(vendor) are unable to process payment by EFT-paper checks can be processed and mailed monthly.

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

Cases where it is determined that subsidy payments were possibly issued due to fraud or when a household was ineligible will be referred for Fraud investigation through JCDSS and/or repayment agreements with JCDSS and recouped through our agency with all available options. JCDSS will use all available options to recover any payments that were issued on behalf of ineligible households. These options include but are not limited to repayment agreements, legal judgements, and wage garnishments. JCDSS Fraud investigation will pursue legal options if necessary.

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 supplement

Payments will be made directly to LL. RSP will be a project in HMIS, households are not able to be enrolled in 2 projects at the same time in this system. RSP payments will also be coordinated/verified related to any assistance applications. Program enrollment and annual recertification releases of information will include JCDSS mainstream programs/benefits. Monthly payment listing preparation will include verification of case status for households in receipt of TA through available systems such as WMS and IEDR. HUD CoC subsidy programs are in HMIS as well all JCDSS housing projects-including the emergency housing hotel/motel program. The agency work with HMIS administration and Coordinated Entry will ensure that households are only enrolled in one of these supportive housing programs at a time.

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.

Combination of both paper files/originals for active households and electronic files for record retention of household files. Electronic files for HMIS and financial information. Files include all assessments/eligibility determinations, notifications, changes, and communications.

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.

JCDSS will report on this program using a separate HMIS project and financial reports. This includes the ability to report on household situations at both intake and exit.

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

Jefferson County does have a current Safety Net Supplement (SNS) plan approved. The SNS is only available to households with single individuals or childless couples eligible for ongoing TA. RSP will be available for any household composition type; income based so able to assist those employed or in receipt of unearned income; also, able to assist those ineligible for TA SNS due to prior evictions from subsidized housing or sanctioned households.

TA staff will be able to verify receipt of RSP at intake; as well as RSP staff checking when new households are enrolled. Households eligible for and receiving SNS would not receive RSP. SNS is the first option to be considered for eligible households, RSP can only be considered after exhausting SNS as an option. If there is a change to a household's circumstance while in receipt of RSP and they apply for TA, program staff and household will consider which assistance would provide the most stability; maintain RSP or transition to SNS. JCDSS will verify information regarding those households enrolled with the RSP;

RSP will verify receipt of TA as well as other income and resources.

RSP payments are processed outside of TA/WMS systems. Storage of files/documents for RSP records are kept separately from TA/WMS as well. Primary storage of RSP will be with HMIS as well as paper/electronic files with our agency. For TA programs, the RSP payments will be very similar to other housing subsidy payments currently in use with TA households like Section 8 or HUD subsidy programs. TA workers will receive shelter verification and household composition forms as well as rent letters to document the RSP subsidy related to TA households. These forms are imaged in IEDR as well as noted in case comments for ongoing reference by TA staff; as is currently the process for other subsidy program payments/documentation.