

2021-2022 New York State Rental Supplement Program Plan

District: St. Lawrence County Dept. of Social Services

Contact Person: Karen Durham, Head Social Welfare Examiner

Telephone: 315-379-2155

Email: Karen.Durham@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 RSP project will be delegated in full to the local Massena Independent Living Center, Inc., a not-for-profit agency serving St. Lawrence County with ESG-CV and STEHP funded programs. MILC and SLCDOSS are members of the local Points North Continuum of Care NY 522. MILC participates in Coordinated Entry and will utilize the CE system to accept referrals to the RSP in addition from outside sources. SLCDOSS will participate in quarterly CoC meetings and will assist with any strategic planning to the project, as needed.

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.

Apartment Size	SRO	Efficiency	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd
Est. Minimum Household Size	1	1	1	1	3	4	5
Est. Maximum Household Size	1	2	2	4	6	8	10
100% FY 2022 HUD FRM	\$445.50	\$594.00	\$677.00	\$827.00	\$1,047.00	\$1,186.00	\$1,363.90
85% FY2022 HUD FMR State Reimbursed	\$378.67	\$504.90	\$575.45	\$702.95	\$889.95	\$1,008.10	\$1,159.32
Max Supplement Amount	\$378.67	\$504.90	\$575.45	\$702.95	\$889.95	\$1,008.10	\$1,159.32
District Funded Amount	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

The household size is an estimate that will be contingent on a variety of factors including disability, relationship status, custody arrangements, unborn children, and temporarily absent family members (ie: in rehab).

RSP Supplement Amount: \$700 average. Based on prior experience with ESG and STEHP, the most common size apartments are 1-3 bedrooms. The average for those 3-unit sizes with 85% supplement is \$722.78. This is without factoring in household contribution of 30%.

Anticipated Number of Households to be Served: 32

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).

MILC currently serves as a local ESG-CV and STEHP provider who works directly with SLCDOSS to receive referrals. Upon placement in emergency housing, SLCDOSS requires the participant to contact MILC to locate permanent housing within 10 days. In addition, MILC receives referrals from Coordinated Entry and local organizations throughout St. Lawrence County. MILC will provide outreach to populations located in emergency housing and domestic violence shelters and will prioritize those populations into the ESG-CV or STEHP Rapid Re-housing program for placement. These households will then be discharged from the Rapid Re-housing project to the RSP program for ongoing subsidy.

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.

Participants will be initially screened for eligibility to MILC's ESG-CV or STEHP programs with existing staff. If eligible, clients will be enrolled in those STEHP or ESG-CV programs within 5 business days. During the initial screening, existing staff will also screen for RSP appropriateness. Eligible clients will be enrolled in STEHP/ESG-CV and placed in permanent housing within 3 weeks of enrollment. Appropriate participants identified by STEHP/ESG-CV staff as individuals who will need the ongoing rental supplement will apply to the RSP program after placed in permanent housing. Notification of approval will be provided within 30 days of application to both the tenant and landlord. The Participant will not receive any financial assistance from STEHP/ESGCV once accepted into the RSP program and the participant can be discharged from STEHP/ESGCV.

Those not eligible for STEHP/ESG-CV assistance will be immediately routed to RSP staff representative to complete intake and application within 5 business days. Application for RSP will be completed with tenant and information collected will include proof of identity, proof of income, proof of housing crisis (ie: eviction notice or written statement from SLCDOSS/Emergency shelter provider informing of homeless status). An initial housing budget and approval notice will be provided to the participant within 15 business days that includes information on FMR and maximum rental allowance available for each unit size. A pending budget will be prepared for the Participant to utilize during their housing search to show potential landlords of their ability to afford rent with the assistance of the subsidy.

If participant is applying for the RSP as a homeless prevention case, application and eligibility determination process will be the same as homeless populations. It is expected that notice of approval with budget and Assistance Agreement between the landlord and participant will be executed within 30 days of application.

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.

RSP application forms will mimic the data requirements of the Homeless Management Information System. Demographic information for all household members will be collected along with supporting documentation. Income from the most recent 30 days will be collected from all household members to determine RSP voucher amount along with current FMR values. A rent reasonableness and FMR comparison sheet will be used to review the unit in which the participants will be residing. A budget calculation worksheet will be utilized to determine the subsidy amount based on the household income and FMR of the unit size. Approval notice will be provided to the tenant and landlord containing the monthly subsidy amount and the length of time approved. The tenant and landlord will also complete an assistance agreement acknowledging the terms of the financial assistance. The participant will sign a Rights and Responsibilities document attesting that they understand their responsibilities to notify of income and household changes within a set time frame, to notify of housing risk, and to notify of any pending move so that a new

calculation and approval may be completed, if eligible. Participants will recertify their financial eligibility every 12 months. If it is determined the participant is no longer financially eligible to continue – a 30-day discontinuation notice will be sent to the tenant explaining how the financial eligibility was calculated and the reason for the discontinuation. A separate notice will be sent to the landlord explaining when the final RSP payment will be provided.

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.

It is anticipated that the majority of those served will be homeless or at-risk single individuals with minimal irregular income, or with temporary assistance as their only source of income. These individuals are often placed in emergency housing by SLDCDOSS and are unable to locate permanent housing due to inability to afford ongoing rent. Individuals in emergency shelter will be prioritized. Many of these individuals will have criminal histories – which further affects the ability to obtain permanent housing.

Other priority categories will be at-risk or homeless families with children under 17 that have SSI or temporary assistance as their primary source of income and individuals & families experiencing DV.

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 households will be screened for financial eligibility utilizing screening tools and income will be verified. Current STEHP/ESG-CV staff will provide intake services and already screen for 30% AMI for STEHP and 50% AMI for ESGCV. It is expected that financially eligible participants will be routed through STEHP or ESGCV first for rapid re-housing services, if appropriate. Once in permanent housing, those participants will be re-referred to RSP for application for ongoing rental subsidy as part of the discharge process from the STEHP/ESGCV programs. When ESGCV program ends on 9/30/22 – all potential participants will be screened by STEHP staff members. If the participant is over 30% AMI, but less than 50% AMI, they will be immediately referred on to the RSP staff member for application.

Income within the last 30 days will be collected from all household members to determine income eligibility. A household budget calculator will be completed with the total household income, the rent amount, and fair market rent 85% maximum, to determine the RSP amount that will be provided. Using the calculator, the RSP must allow for tenant contribution to be no more than 30% of their household income. If it is determined that 85 % FMR would not be affordable based on household income, participant will need to locate an alternative housing unit. EXAMPLE: FMR for 0 bdrm is \$594.00; 85% of which would be 504.00/mo. If tenant has extremely low/irregular income, 30% contribution may not be enough to cover the unpaid portion of rent. SLCDOSS and MILC will not be using local funds to fund the remaining 15% of the FMR cost. Tenant will need to locate a more affordable rental unit.

Income and household eligibility will be recertified every 12 months to assure continued financial 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?**
- **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 of 12 months will be required of all tenants at initial lease up. After 12 months, the tenant and landlord can agree to continue on a month-to-month basis. The cost of rent will be evaluated against Fair Market rent and rent reasonableness charts established by the ESGCV/STEHP programs, which are updated continuously.

Prior to move-in, all apartments will undergo inspections and lead based paint review utilizing the HUD visual inspection methods and will follow ESG guidelines for habitability.

Households will be required to report changes in income and household composition within 30 days of change. Households will need to recertify their income every 12 months to determine continued financial eligibility and RSP amount if no changes are reported. As part of the rights and responsibilities – tenants will need to notify MILC if they intend to move. Prior to move, the participant will be required to provide information on the new rental unit so a new FMR/Rent Reasonableness review and inspection can be completed. If the tenant does not obtain prior approval of the new unit, they will be at risk of having an insufficient subsidy for the new unit. Participants will be notified in writing of any eligibility or RSP subsidy changes due to recertification or change in household status within 15 business days of providing supporting documentation of the change to MILC. RSP subsidies will not be ported outside of St. Lawrence

County if the participant moves out of county. If the participant moves out of St. Lawrence, the RSP will end, and notification will be sent to both the tenant and the landlord. RSP participants from outside St. Lawrence County will not be accepted onto this RSP program. Participants will be required to report outside supplements that become available to the participant. This includes HUD Section 8 Vouchers, Supported Housing programs, OPWDD subsidies, and/or moving into public housing projects. If an alternative subsidy becomes available for the participant, they will be discharged from the RSP project to assure a duplication of payment is not provided. Participant may sign a 3rd party release to confirm they are not already enrolled in another subsidy project.

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.

It is expected that the length of time the participant will be on the supplement will be no less than 12 months. The supplement will end when the household's income increases to a level where their total monthly rent is at 30% or less than their total monthly income. Recertification for eligibility will be completed every 12 months. Both landlord and tenant will receive a notice 60 days before recertification that it is time to renew. Because priority households will include individuals and families with temporary assistance or SSI as their primary source of income – it is expected that many will be financially eligible indefinitely. However, participants will be expected to agree to a rights and responsibilities of the RSP program. This will include paying their portion of rent, participating in the recertification process, and acting in an appropriate manner with staff that does not pose a health or safety risk; violence against MILC staff will not be tolerated. The rights and responsibilities will clearly define the reasons why someone may be terminated from the program although they continue to be financially eligible. Participants will also be discharged if they move in to public/subsidized housing, or receive another subsidy through HUD, supported housing, OMH, OPWDD, or other agency.

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

Monthly payments in the form of a check will be mailed directly to the landlord. Landlords will provide MILC with a W9 for tax purposes. Landlords will be issued 1099s at the end of the calendar year.

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

Suspected cases of fraud and/or cases determined to otherwise be ineligible will be referred to SLCDOSS Investigation Unit to investigate to determine the amount of overpayment and recoup funds from the participants. SLCDOSS will follow their standard operating procedures for investigation, recoupment, and litigation. Referrals from MILC will be assigned to the investigator handling the geographical area. Upon completion of the investigation, cases found to be fraudulent will have the overpayment determined by the investigator, notification will be sent to the appropriate party(ies) and any overpayments reported to the accounting unit for collection. OTDA and SLC District Attorney's office will be contacted for direction when appropriate.

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.

A review of other housing subsidies will be completed at intake and assessment. A 3rd party release may be signed by the participant to confirm they are not already enrolled in other subsidy programs. Because priority households will have Temporary Assistance or SSI as their main source of income, RSP staff may also confirm sources of income and subsidies with the local SLCDOSS. If the client becomes eligible for other subsidies, they will be required to inform RSP. RSP will terminate when the other subsidy begins to avoid duplication.

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.

MILC will investigate the possibility of utilizing HMIS for data entry of the RSP program. If found not feasible, MILC will utilize its own in-house software system to track demographics and service records. Paper copies of all service records, applications, supporting documents, and notices to the participant/landlord will be kept in locking file cabinets.

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.

MILC will utilize tracking tools and data entry systems to maintain client information and service records either through HMIS or CIL Suite (MILC's database). Both databases have the capability of tracking demographic information, household size, income, and services provided. Reports can be generated to complete the template provided by OTDA. Payments will be tracked through QuickBooks Not for Profit edition which will contain information about payments provided and duration. Clients will recertify every 12 months and any updates will be made in the data entry system.

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**

SLCDOSS does not currently have an approved Shelter Supplement Plan and therefore duplication

Attachment B

will be avoided. MILC will screen for eligibility of ESG-CV/STEHP/RSP at intake and will assure no clients are concurrently enrolled in any of those programs to avoid any duplication.