

2021-2022 New York State Rental Supplement Program Plan

District: Tompkins

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RSP Implementation Date: Based on Approval Date

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 will be fully operated through direct administration by Tompkins DSS. Tompkins DSS will coordinate with the CoC, accepting referrals through Coordinated Entry and utilizing the CoC structure to create access and coordination of homeless prevention assistance.

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: \$461,767

FY 2022 HUD FMR for Tompkins County

Allowable Number of Bedrooms	Household Composition	100% FY2022 HUD FMR	85% FY2022 HUD FMR State Reimbursed	Max Supplement Amount	District Funded Amount
1	HOH	\$1127	\$958	\$958	\$169
1	HOH, spouse/cohabitant	\$1127	\$958	\$958	\$169
2	HOH 1 child/adult	\$1365	\$1160	\$1160	\$205
2	HOH, 2 children/adults	\$1365	\$1160	\$1160	\$205
2	HOH, spouse/cohabitant, 1 child/adult	\$1365	\$1160	\$1160	\$205
2	HOH, spouse/cohabitant, 2 children/adult	\$1365	\$1160	\$1160	\$205
3	HOH, 3 children/adults	\$1743	\$1482	\$1482	\$261
3	HOH, 4 children/adults	\$1743	\$1482	\$1482	\$261

3	HOH, spouse/cohabitant, 3 children/adult	\$1743	\$1482	\$1482	\$261
3	HOH, spouse/cohabitant, 4 children/adult	\$1743	\$1482	\$1482	\$261
4	HOH, 5 children/adults	\$1851	\$1573	\$1573	\$278
4	HOH, 6 children/adults	\$1851	\$1573	\$1573	\$278
4	HOH, spouse/cohabitant, 5 children/adult	\$1851	\$1573	\$1573	\$278
4	HOH, spouse/cohabitant, 6 children/adult	\$1851	\$1573	\$1573	\$278

Anticipated Number of Households to be Served: 35-38 Households

The district is planning to pay 100% of FMR using local funds.

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).

Outreach to households that are in the shelter or experiencing homelessness will be accomplished through weekly meetings with our County's Shelter Provider and TDSS Special Services Unit, participation in Coordination Entry, and coordination with existing STEHP and ESG Rapid Rehousing and other housing programs serving homeless individuals and families.

Outreach to households that are at risk of homelessness will be accomplished through coordination with 2-1-1 that has served as our County's ERAP support provider, Law-NY's homelessness prevention staff, collaboration with existing STEHP and ESG Homeless Prevention Programs, other housing programs serving low-income households, and TCDSS eligibility units.

In addition, information about the RSP will be shared at monthly meetings of the CoC and Homeless Housing Task Force.

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.

Intake Assessments will be done by phone using an intake modeled after the HMIS intake assessment which provides a comprehensive assessment of the household's situation and needs. Households will be asked to complete Releases of Information that allow program staff to reach out to other agencies for documentation and to confirm information. A follow up letter/documentation request form will be given to applicants and their advocate/referral agency to provide other information/documentation required to determine eligibility. If information is not received within 2 weeks, the application will be put on hold and can be re-opened when information is received. A checklist will be utilized to ensure that applicant meets financial and other eligibility criteria including priority areas described in the section on eligibility. Decisions

regarding applications will be processed within a day or two of completion of intake and receipt of other information/documentation required for determination of eligibility which in most circumstances will be less than 30 days. Acceptance or denial letters will be mailed once a decision is made with a copy mailed to the household's advocate/referral agency.

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 to be used in the application and determination process include the intake assessment, releases of information, case notes from intake assessment and correspondence with referral agencies, and eligibility checklist will be used in determining eligibility for RSP (forms are included in attachments). In addition, each household will be issued an award letter and asked to sign a program agreement that outlines the services provided by RSP and the responsibilities and expectations of participants.

When households do not meet financial or other eligibility criteria for RSP, a denial letter will be sent that contains eligibility criteria and why the household does not meet these criteria (copy of letter is included in attachments). Efforts will be taken to refer the household to other resources at TCDSS and in the community.

Eligible households will receive an acceptance letter that explains the program and details the supports that the household will receive and the expectations and responsibilities of the household. It also includes the FMR guidelines for housing based on household composition, the amount of rent the household will be responsible for based on income, the duration of the program, and the quarterly reassessment process used to determine ongoing need for support. The Landlord will also receive an initial letter describing the RSP, confirming the rental amount and duration of the lease/agreement, and the amount of rent to be paid by the household and the RSP for the first 3 months.

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.

As the need for support through RSP is expected to exceed the allocation, priority will be placed on serving the following populations that have the greatest needs and/or have not been eligible or otherwise able to partake in other housing assistance programs. These populations are:

- Families accessing emergency shelter services
- Single individuals or couples that have utilized shelter services for 90 days or greater

- Individuals and families that have already or will be ending time-limited rental and other supports through STEHP or ESG programs and need continued assistance to prevent becoming homeless (note: households will not be enrolled in both programs at the same time)
- Individuals and families that are residing in unsafe dwellings
- Individuals and families that do not meet eligibility requirements for Temporary Assistance back rent payments
- Other individuals and families whose unique circumstances have made them ineligible for other homeless or homeless prevention assistance

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 reported income will be assessed using AMI based on household composition with priority given to households at or below 30% AMI. The initial acceptance letter will explain the amount of rent the household will be responsible for based on 30% of earned and unearned income. Every three months, households will need to confirm their current income and project staff will then make any needed adjustments in the amount they are expected to pay so they continue to be responsible for rent based on 30% of income. Households will only need to provide copies of a recent pay stub or other documentation of other earned or unearned income that TCDSS cannot access (note: a re-certification application will not be used). Letters are then sent to both the household and the landlord stating the amount of rent the household will pay and the amount that will be paid by RSP. At this 3-month reassessment, program staff will determine if the household's income has reached (and stabilized) at a level where monthly rent is no more than 30% of their earned and unearned income. When this occurs, the household will be contacted by project staff and exit letters will be sent to both the household and Landlord, providing a minimum of 30 days' notice of assistance ending (copies of the RSP payment and exit letters to the household and landlord are included as attachments).

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?

Program expectations for households participating in the Rental Assistance Program are:

- If you do not currently have housing or are seeking new housing, you must be actively engaged in a housing search and provide the RSP program with the contacts and applications you have completed each week (minimum of 3 per week)
- Apply and follow through on orientation and other requirements for obtaining HCV (Section 8) or other long-term rental assistance
- Report any changes in contact information, household composition, income, or DSS benefit status within 30 days of the date of the change
- Make timely monthly payments to the landlord of your portion of the rent as listed on the Payment Guarantee Letter
- Provide requested documentation of earned and unearned income on a quarterly basis to determine the amount of RSP rental assistance and to determine continued need for assistance
- Meet at minimum bi-weekly in person or by phone with your RSP Case Manager during the housing search and quarterly once housing is obtained

Note: In addition to the above program expectations, other actions including fraud, dangerous and/or threatening behavior, illegal activity, and other actions that pose a serious risk to you or others may result in immediate termination from RSP.

Either a lease or written agreement specifying rental amount and length and terms of continued rental will be required.

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

As mentioned above, a lease or other written agreement specifying the rental amount will be required. The amount of the rent and the portion paid by the household and RSP will be confirmed via a letter issued to both the household and landlord at the start of the program. After each 3-month reassessment, a letter will be sent to the household and the landlord stating the amount to be paid by the household and RSP for the next 3-month 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?

Completion of the HPRP Housing Habitability Checklist as well as Lead Disclosure Form will be required prior to any rental arrears, security deposit, or monthly rental assistance payments being issued (copies of these documents are included as attachments). If in doubt, the program will also verify that a Certificate of Occupancy is on file for the property.

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

During the intake, and outlined in the program agreement, households are informed of their responsibility to report changes in income, household composition, and other factors that affect the assessment of the amount of rent they pay within 30 days of the change. Ongoing case management and communication with the landlord including a check in with both the household and landlord at the 3-month reassessment will help ensure modifications are reflected in the next quarter's payment schedules.

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

New housing will need to meet the standards in the HPRP Housing Habitability Checklist as well as the LEAD attestation before any security deposits or rental payments are issued. We also use FMR as a general standard to ensure that housing will meet eligibility for ongoing support through HCV or other HUD voucher programs if the household is eligible for this as a long-term support option.

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?

Households are informed of their responsibility to report significant changes in income, household composition, and other factors that affect the assessment of the amount of rent they pay within 30 days of the change. Failure to inform TCDSS of these changes unless there are good cause/extenuating circumstances that interfered with reporting these changes will result in a written warning and any subsequent failure to report changes will result in the household being discharged from the program. The household and the landlord will then receive a 30-day notice of the ending of rental support through RSP.

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

At intake, households will need to report if they are receiving any contributions toward rental costs from individuals outside the household and such income will be verified through submission of bank statements, IRS tax documents, and /or copies of trusts where a member of the household receives financial payments. This information will be utilized for calculating the 30% income contribution toward rent. Households will then be required to submit updated information quarterly to project staff. This information will be used to ensure that the household's rental payment accurately reflects the household's current income. Any changes in the above between the 3-month reassessments are expected to be reported within 30 days so adjustments in the amount of rental payments can be made.

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.

RSP will be made available to eligible households initially for a 12-month period and can be continued based on need and compliance with program expectation as long as additional funding is available. As mentioned above, quarterly re-assessments will be utilized to determine the household's need for continued support and compliance with program expectation. Non-payment of the household's portion of rent, unless there are good cause/extenuating circumstances, will result in a written warning and any subsequent non-payment of the household's portion of rent will result in the household being discharged from the program. The household and the landlord will then receive a 30-day notice of the ending of rental support through RSP.

In instances where the head of household has a disability that interferes with their ability to manage their finances, a referral will be made to APS and participation in APS services may be required as a condition of continued support through RSP.

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

Checks will be issued directly to the landlord or designated management company.

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

Pay stubs, tax information and other income documentation will be used to confirm income, Social Security and other income of household members and coordination through Coordinated Entry and CoC will help ensure there is no duplication of assistance from RSP and other programs. Quarterly reassessments will allow us to catch any unreported changes and address these within the 3-month period, thus allowing for timely adjustments of RSP payments. Situations of suspected fraud will be referred to our Security/Fraud Unit for investigation, recoupment of ineligible payments, and referral to legal authorities if indicated.

Tompkins County Fraud Division Supervisor recently retired. Currently, our Fraud Unit is being re-organized, and processes are being reviewed and updated. In general, if it is determined that there has been payment on a fraudulent case or case determined to be otherwise ineligible, TCDSS will take reasonable efforts to recoup funds as follows:

1. Notify the household of the amount and reason for the overpayment and that repayment is required in lump sum or payment agreement that is no longer than 12 months.
2. Discharge household from the program
3. Suspend eligibility for re-enrollment for at least one year
4. If after one year, the household re-applies, TCDSS will make a determination which includes the status of the repayment agreement and an assessment of the household's ability to pay rent and housing stability, or lack thereof. A number of factors will be used

for the determination including client mental health status, household composition and nature of original reason for program ineligibility.

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 eligibility checklist is used during intake to help ensure that we have a comprehensive view of what benefits and financial supports the household is receiving. Review of program enrollment data in HMIS, attendance at monthly Coordinated Entry meetings, updates from HCV providers on eligibility determinations and waiting lists, and other collaborations that have been set up among TDSS, CoC, and other rental assistance programs, the RSP will be able to ensure coordination and non-duplication of rental support through local, state, and federal funding sources. These sources will be used along with the information obtained from households during the quarterly reassessments of RSP rental assistance and ongoing case management contacts with households to ensure there is no duplication of rental assistance.

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 households will have a paper file kept in secured file cabinets. Households that have open cases with TDSS will also have all documents in the paper files scanned and stored in IEDR. Given the nature of the program and our experience with HMIS with other programs, we believe that using internal client file system along with existing spreadsheets to monitor intakes enrollments, quarterly assessments, rental supplements and exits is more effective and efficient than HMIS. Paper and computer files will be maintained in accordance with OTDA regulations.

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.

Demographic information and household income and sources will be obtained at time of intake and updated on a quarterly basis during reassessments. Documentation of rental arrears, security deposit and ongoing rental assistance and household payment amounts will be maintained in individual household files and payments made to landlords through RSP for all households will be recorded on a central project spreadsheet. Quarterly case notes will document whether there is need for continued rental assistance; if there are changes in income, living situation, household composition, need for and involvement in other community agencies, and other factors relevant to the household's ability to maintain housing; Within the client file, quarterly assessments along with case notes will also track changes in rent, housing conditions, or lease/agreement with

landlord; summarize any issues that have arisen in the household's compliance with project expectations; and document the date and reasons for ending/discharge from RSP. As mentioned above, given the nature of the program and our experience with HMIS with other programs, we believe that using internal client file system along with existing spreadsheets to monitor enrollments, rental supplements, earned and unearned income and other demographics is more effective and efficient than HMIS.

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

Tompkins County does not have an approved Shelter Supplement Program.