

**2021-2022 New York State Rental Supplement Program Plan
For Westchester County: FINAL as of 2/14/2022**

District: Westchester County

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RSP Implementation Date: To be determined based on plan approval date.

1) 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.

Westchester's Rental Supplement Plan will be administered by a non-profit organization chosen through a local Request For Proposal (RFP) process. Westchester County DSS (WCDSS) will coordinate the process with our local HUD-funded Continuum of Care, the Westchester County Continuum of Care Partnership To End Homelessness (WCCoC).

2) 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: WCDSS will initially cap the RSP supplement amounts at **85%** of local annually updated FMR values established by HUD for the Westchester, NY Statutory Exception Area (found at <https://www.huduser.gov/portal/datasets/fmr.html>), but WCDSS reserves the right to increase the amount using local funds in the future if needed to effectively implement the program.

Final FY 2022 FMRs By Unit Bedrooms							
Year	Efficiency	1-BR	2-BR	3-BR	4-BR	5-BR	6-BR
FY22 FMR	\$1,353	\$1,566	\$1,883	\$2,377	\$2,682	\$3,084	3,486
RSP (85% FMR)	\$1,150.05	\$1,331.10	\$1,600.55	\$2,020.45	\$2,279.70	\$2,621.40	\$2,963.10
Household Size*	1	1-2	2-3	3-4	4-5	5-7	6-8

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* Note: the number of bedrooms approved for a given household size will take into account the age and gender distribution of household members. For example, spouses would be expected to share a bedroom while an adult child and their parent would not.

Anticipated Number of Households to be Served: WCDSS expects to annually serve at least **100** households in our RSP program.

3) 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).

The Westchester CoC (WCCoC) will coordinate outreach to the 6 populations that will be served by Westchester’s RSP. The WCCoC’s Coordinated Entry process will collect referrals to RSP from multiple sources, prioritize them, and then electronically transmit them via our WCCoC’s Homeless Management Information System (HMIS) to the local non-profit contractor chosen to administer our RSP. The WCCoC’s Coordinated Entry Process is managed by a full-time Program Administrator in WCDSS’ Office of Temporary Housing Assistance.

Target Population	Referral Sources
<p>1) <u>Singles and families currently in the Westchester County shelter system who are not prioritized for housing subsidies by our WCCoC</u> because they lack both the severe long-term disabilities needed to qualify for WCCoC-funded Permanent Supportive Housing (PSH) AND the strong employment histories needed to be prioritized for WCCoC-funded time-limited Rapid Rehousing (RRH) subsidies. This target population will comprise at least 50% of the households served by Westchester’s RSP.</p>	<p>The WCCoC Coordinated Entry Process will generate 50+ referrals of singles and families currently in Westchester’s shelter system with low PSH and low RRH scores on WCCoC’s Comprehensive Homeless Assessment Tool (CHAT) prioritized by the longest length of time currently homeless. Their current shelter providers (all WCCoC member agencies) will then work with the WCCoC to generate RSP applications for those customers.</p>
<p>2) <u>Singles and families who are actively fleeing or attempting to flee domestic violence or sexual trafficking</u>, have no other residence, AND lack the resources or support networks to obtain other permanent housing,</p>	<p>RSP referrals and applications will be accepted for this population from Westchester’s two leading domestic violence shelter and service providers (My Sister’s Place and Hope’s Door) and from the Domestic Violence Liaisons assigned to the shelter system by the Westchester County Office for Women. All three of these referral sources have worked closely with our WCCoC on NYS Emergency Housing Voucher referrals and other housing initiatives.</p>

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Target Population	Referral Sources
3) <u>Singles and families currently enrolled in time-limited Rapid Rehousing programs (funded by WCCoC, ESG or NYS) who are losing their subsidies within 4 months</u> and are not expected to have raised their incomes sufficiently to sustain their permanent housing without other ongoing housing subsidies,	RSP referrals and applications will be accepted for this population from the roughly half dozen local non-profits currently administering Rapid Rehousing programs. All routinely work with our WCCoC's Coordinated Entry process.
4) <u>Singles and families currently enrolled in Westchester's locally-funded time-limited housing subsidy program, Keys to a Home, who are losing their housing subsidies within 4 months</u> and are not expected to have raised their incomes sufficiently to sustain their permanent housing without other ongoing housing subsidies.	RSP referrals and applications will be accepted for this population from the sole non-profit agency administering Keys To A Home subsidies: CLUSTER, Inc. CLUSTER routinely works with our WCCoC's Coordinated Entry process.
5) <u>Customers applying for WCDSS Emergency Assistance (through the EAF, ESNA or ERAP programs) who are unable to afford future rents.</u>	RSP referrals and applications will be accepted for this population from the roughly one dozen non-profit agencies currently administering publicly- and/or privately-funded eviction prevention rent arrears payments in Westchester. All of these agencies are coordinated through our WCCoC's Westchester Eviction Prevention Network and almost all already routinely work with our WCCoC's Coordinated Entry process.
6) <u>Temporary Assistance recipients previously receiving WCDSS Shelter Supplement funding who are no longer eligible to receive Shelter Supplement subsidies but cannot afford to sustain their current housing without subsidies.</u>	RSP referrals and applications will be accepted for this population from the WCDSS Eligibility Examiners responsible for closing out the Shelter Supplement subsidies.

4) 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.

The Eviction Prevention Network, WCCoC, and RSP Coordinator will develop a brief referral form for this program. It will document their household income, how the household qualifies as one of the six populations targeted for RSP subsidies, and the amount of monthly subsidy needed. The agencies detailed below will complete the referral forms for their clients.

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- The WCCoC Coordinated Entry Process will generate 50+ referrals of singles and families currently in Westchester’s shelter system with low PSH and low RRH scores on WCCoC’s Comprehensive Homeless Assessment Tool (CHAT) prioritized by the longest length of time currently homeless. Their current shelter providers (all WCCoC member agencies) will then work with the WCCoC to generate RSP applications for those customers.
- RSP referrals and applications will be accepted from individuals and families actively fleeing domestic violence and/or sexual trafficking from Westchester’s two leading domestic violence shelter and service providers (My Sister’s Place and Hope’s Door) and from the Domestic Violence Liaisons assigned to the shelter system by the Westchester County Office for Women.
- RSP referrals and applications will be accepted for individuals and families losing Rapid Rehousing subsidies within four months and who are not expected to raise their household incomes sufficiently to sustain their permanent housing without other ongoing housing subsidies, from the roughly half dozen local non-profits currently administering Rapid Rehousing programs.
- RSP referrals and applications will be accepted for singles and families currently enrolled in Westchester’s locally-funded time-limited housing subsidy program, Keys to a Home, who are losing their housing subsidies within 4 months and are not expected to have raised their incomes sufficiently to sustain their permanent housing without other ongoing housing subsidies will be accepted for this population from the sole non-profit agency administering Keys To A Home subsidies: CLUSTER, Inc.
- RSP referrals and applications will be accepted for customers applying for WCDSS Emergency Assistance (through the EAF, ESNA or ERAP programs) who are unable to afford future rents will be accepted from the roughly one dozen non-profit agencies currently administering publicly- and/or privately-funded eviction prevention rent arrears payments in Westchester.
- RSP referrals and applications will be accepted for singles and families previously receiving WCDSS Shelter Supplement funding who are no longer eligible to receive Shelter Supplement subsidies but cannot afford to sustain their current housing without subsidies from the WCDSS Eligibility Examiners responsible for closing out their Shelter Supplement subsidies.

The referral forms will be forwarded to WCDSS’ Coordinated Entry Program Administrator. The households will be entered into the Coordinated Entry program in WCCoC’s Homeless Management Information System (HMIS). The Coordinated Entry Program Administrator will then use our HMIS to generate a prioritized list of households to be referred for RSP subsidies.

The local non-profit agency chosen by WCDSS via RFP to administer Westchester County’s RSP process will then receive a notice via email that names have been entered into the prioritized list. The RSP contractor will have access to HMIS and be able to access the full current prioritized RSP list and all of the associated client data at all times. The RSP contractor will then work with the referring agency to collect and upload a “full RSP application” consisting of additional required eligibility info including proof of household composition and household income.

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The RSP contractor will then make a determination of whether a referred household will be approved for RSP subsidies **within 30 days** of receiving a completed “full RSP application.”

The RSP contractor will then send a letter (and, if possible, an email) to the applicant household stating whether they have been approved. If they have been denied, the letter will state why they were denied and state whether there are steps they can take to reopen the application process, e.g. by supplying missing documentation. If they have been approved, the letter will state the amount of the RSP subsidy that will be paid directly to the landlord each month and the number of months that the subsidy will be provided. It will also list any requirements that must be met to continue the subsidy. A copy of the approval letter will be sent to both the applicant household and the landlord.

5) 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.

The RSP contractor will send a written determination notice to each applicant household within 30 days of receiving a complete application. If the application is approved, the determination notice will state the amount of the RSP subsidy that will be paid directly to the landlord each month and the number of months that the subsidy will be provided. It will also list any requirements that must be met to continue the subsidy. A copy of the approval letter will be sent to both the applicant household and the landlord.

If the application is denied, the determination notice will explain the criteria used and the specific reason why the application was denied. The denial notice will also state whether there are steps they can take to reopen the application process, e.g. by supplying missing documentation. In some cases, applicants will be denied simply because available funding has been exhausted. In these cases, the denial letter will state the waiting period that will be required until the household can reapply.

If an applicant household is initially approved for RSP subsidies and aid is subsequently discontinued, the household and the landlord will be sent a Notice of Discontinuance. This notice will include the reason for the discontinuance, which might be failure to recertify household income, failure to recertify household composition, increased household income above eligibility threshold, or failure to comply with repayment plan due to previously improperly claimed benefits.

The other documents used for Westchester’s RSP program will include a custom-designed Westchester RSP application form, a custom-designed checklist of required application documents, and a standard Housing Quality Standards Inspection form (HUD-52580A) and HQS checklist (HUD-52580). All documents created for Westchester’s RSP will be sent to OTDA for review as soon as they are available.

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6) 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.

Westchester's RSP will target 6 populations:

1. Singles and families currently in the Westchester County shelter system who are not prioritized for housing subsidies by our WCCoC because they lack both the severe long-term disabilities needed to qualify for WCCoC-funded Permanent Supportive Housing **AND** the strong employment histories needed to be prioritized for WCCoC-funded time-limited Rapid Rehousing subsidies. This target population will comprise **at least 50%** of the households served by Westchester's RSP. It will include but not be limited to families in our shelter system where the only family members with legal immigration status are minor children.
2. Singles and families who are actively fleeing or attempting to flee domestic violence or sexual trafficking, have no other residence, **AND** lack the resources or support networks to obtain other permanent housing.
3. Singles and families currently enrolled in time-limited Rapid Rehousing programs (funded by WCCoC, ESG or NYS) who are losing their subsidies within 4 months and are not expected to have raised their incomes sufficiently to sustain their permanent housing without other ongoing housing subsidies.
4. Singles and families currently enrolled in Westchester's locally-funded time-limited housing subsidy program, Keys to a Home, who are losing their housing subsidies within 4 months and are not expected to have raised their incomes sufficiently to sustain their permanent housing without other ongoing housing subsidies.
5. Customers applying for WCDSS Emergency Assistance (through the EAF, ESNA or ERAP programs) who are unable to afford future rents.
6. Temporary Assistance recipients previously receiving WCDSS Shelter Supplement funding who are no longer eligible to receive Shelter Supplement subsidies but cannot afford to sustain their current housing without subsidies.

NOTE: WCDSS will implement NYS OTDA's requirement that initial priority be given to households who earn no more than 30% of Median Family Income (MFI) by **only** accepting households with incomes below 30% of MFI for the first 3 months of Westchester's RSP. WCDSS will expand eligibility beginning in Month 4 to include households with monthly incomes up to 50% of MFI.

7) Indicate how the following eligibility standards will be met:

- a) **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**

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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;

The RSP contractor will collect written documentation verifying each applicant's household income. WCDSS will share any income documentation that it has collected from the household within the last 3 months. The RSP contract will calculate the household's monthly income using current monthly income for the household and excluding TA benefits, 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.

The RSP contractor will then calculate the household's current monthly income as a percentage of the most recently published Area Median Family Income (MFI) for their household size in the Westchester County, NY Statutory Exception Area, as published and annually updated by the U.S. Department of Housing and Urban Development, which can be found at <https://www.huduser.gov/portal/datasets/il.html>.

Eligibility for Westchester's RSP housing subsidies will be limited for the first three months of the program's operation to "Extremely Low-Income" households with incomes at or below 30% of Westchester's Median Family Income. Beginning in the program's fourth month of operation, eligibility will be expanded to include "Very Low-Income" households with incomes at or below 50% of Median Family Income.

FY2021 Median Family Income Limits: Westchester County, NY Statutory Exception Area

	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
30% MFI	26,800	30,600	34,450	38,250	41,350	44,400	47,450	50,500
50% MFI	44,650	51,000	57,400	63,750	68,850	73,950	79,050	84,150

b) A household's financial contribution will be limited to 30% of their households' total earned and/or unearned income; and

Westchester's RSP contractor will calculate each participating household's financial contribution at 30% of the household's total earned and/or unearned income, using the forms and calculation processes currently used by the WCCoC for Westchester's HUD CoC-funded programs. The head of household will be notified in writing of the amount of their expected monthly contribution. Participants will be informed that they must notify the RSP contractor within 30 days of any changes in their monthly income so that their financial contribution can be recalculated. Each household's income will be verified, and their financial contribution will be recalculated at least annually.

The RSP contractor will ask landlords to contact the RSP contractor whenever an RSP participant is late paying their share of the monthly rent. A caseworker from the RSP contractor will contact the RSP participant's head of household immediately to determine the reason for the late payment. If the cause is due to a reduction in household income, the RSP subsidy will be adjusted retroactively to maintain the household's contribution at 30% of their updated income. The RSP contractor's caseworker will work with the head of household to develop a plan of

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corrective action, which could include a reduction in other areas of household spending, greater use of in-kind resources such as emergency food pantries or soup kitchens, applying for additional entitlements such as childcare subsidies, and/or trying to increase household income through employment by working with local education and employment services. The head of household will be contacted whenever the customer's share of rent is not paid on time. For small balances the participant will be offered assistance trying to negotiate a repayment plan with the landlord. If the household does not bring its rent arrears balance back to zero within a time frame acceptable to their landlord, their RSP subsidy will be terminated.

- c) Supplements are to be provided until the household's income reaches high enough so that the full monthly rent equals only 30% or less of their monthly household income, at which point the housing will be considered affordable for the individual/family and the supplement will end.**

The RSP contractor will contact each participating household at least quarterly to monitor whether there have been any changes in household income. Once the household's income rises high enough so that their entire monthly rent equals only 30% or less of their monthly income, the RSP supplement will be discontinued.

The basic calculation for the amount of RSP monthly subsidy to be provided will be as follows: 85% FMR minus (monthly household income x 0.3) = amount of RSP subsidy provided. The following table shows the monthly and annualized household income levels at which the RSP subsidies would be terminated.

Monthly & Annual Incomes At Which RSP Subsidies End							
	Efficiency	1-BR	2-BR	3-BR	4-BR	5-BR	6-BR
FMR	\$1,353	\$1,566	\$1,883	\$2,377	\$2,682	\$3,084	3,486
85% FMR	\$1,150.05	\$1,331.10	\$1,600.55	\$2,020.45	\$2,279.70	\$2,621.40	\$2,963.10
Max Monthly Income	\$3,833.50	\$4,437.00	\$5,335.17	\$6,734.83	\$7,599.00	\$8,738.00	\$9,877.00
Max Annual Income	\$46,002.00	\$53,244.00	\$64,022.04	\$80,817.96	\$91,188.00	\$104,856.00	\$118,524.00

8) List any other established eligibility criteria and indicate how each criterion will be determined and documented. Include the following:

- a. Will leases be required of all tenants?**

Yes, all RSP participants will be required to initially have a valid lease with a duration of at least one year. Under State law, if leases are allowed to lapse the tenant can remain in the residence on a month-to-month basis. We will follow the procedure established by the WCCoC, which is to let subsidies continue even if the initial lease has been converted to month-to-month tenancy.

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

Not applicable. A valid lease signed by both parties will be required for all RSP participants.

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

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The subsidized housing unit will be required to pass an initial Housing Quality Standards (HQS) inspection before the RSP subsidies will begin to flow to the landlord. All subsidized units must pass HQS re-inspections at least annually. Any HQS violations identified during the inspections must be remedied at the landlord's expense before subsidies can begin or resume. The RSP contractor's caseworkers can be trained to perform the HQS inspections, or the contractor can choose to subcontract with another agency to perform the inspections. The RSP contractor will develop a standard lease addendum that participating landlords must sign that will include a stipulation that the units must pass annual HQS inspections and that remedying HQS violations must be done at the landlord's expense before subsidies can begin or resume.

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

Our RSP will require recipient households to report changes (moves, changes in household composition, and changes in monthly income) within 30 days as a condition of continued eligibility for the supplement. The procedures to be followed for moves is detailed in the next section (8e). In the case of rent increases, changes in monthly income, or changes in household composition, the RSP contractor will recalculate the household's required 30% calculation within 30 days, and the changes will be retroactive to the first month following the change.

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

Our RSP subsidies will continue when an eligible household moves to another location within Westchester County as long as the new housing unit passes an initial Housing Quality Standards inspection, and the household continues to comply with all RSP requirements set by WCDSS.

If a recipient household chooses to move to another DSS district within New York State, the RSP subsidies from WCDSS will continue only for essential moves out of county that are needed to ensure the safety of clients. WCDSS will continue to provide rental supplements to these clients who move to an address located in a different county, as long as the client continues to reside in NYS, and all other program eligibility requirements set by WCDSS are maintained. WCDSS understands that as the originating district, WCDSS will be expected to maintain fiscal responsibility for providing the supplement for the entire length of the supplement. WCDSS will communicate as a courtesy with the County in which the household will be relocating regarding portability of the supplement to the new County.

If a recipient chooses to move to another DSS district within New York State and the RSP contractor determines that the move is not essential to ensure client safety, the RSP subsidies will be terminated immediately when the recipient vacates their current unit.

If an RSP recipient chooses to move outside of New York State, the RSP subsidies will be terminated immediately when the recipient vacates their current unit.

f. 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?

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Yes, our RSP will require recipient households to report changes (moves, changes in household composition, and changes in monthly income) within 30 days as a condition of continued eligibility for the supplement.

g. 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?

Contributions toward rental costs from individuals outside the household will be included in income contributions only if they are verified by written statements signed by the contributing individual that specify the amount to be contributed and the period of time during which the contributions will be made. The RSP contractor will be responsible for making a good-faith determination of whether such contributions can reasonably be expected to be sustained in the future.

9) 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.

These RSP subsidies will be approved in 12-month increments. The subsidies can potentially be renewed indefinitely, contingent upon local needs and continued availability of NYS reimbursement. There will be an annual recertification required, which will include updated verification of household income and household composition, as well as the unit passing an updated Housing Quality Standards inspection. The supplements will end when the household's income becomes high enough that 30% of monthly household income exceeds the actual monthly rent.

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

The designated RSP contractor will pay the RSP subsidies using paper checks paid directly to the landlord. The RSP contractor will be allowed to transition to using electronic funds transfer with prior approval by WCDSS.

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

Ineligible cases will be denied using the written determination procedure detailed above in our response #5. Claims determined to be fraudulent will be referred to the WCDSS Fraud Unit. The Fraud Unit may refer cases, including cases of households not receiving Temporary Assistance, for criminal prosecution. The RSP Contractor and/or the Fraud Unit may offer participants the opportunity to negotiate repayment plans for improperly claimed benefits as an alternative to criminal prosecution or having their RSP benefits terminated.

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Westchester will coordinate its RSP with our local HUD-funded Continuum of Care including standardized use of our CoC's Homeless Management Information System (HMIS) in order to help avoid duplication of benefits and support our district's ability to track services and outcomes related to participation in the RSP.

12) 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.

Our RSP contractor will make the initial preliminary determination of which households appear to be eligible for RSP subsidies. Part of the contractor's applicant screening process will be to check our HMIS to see if other rent subsidies have been entered into HMIS. All Continuum of Care Permanent Housing Subsidies and Rapid Rehousing Subsidies should be entered into HMIS. All Rapid Rehousing subsidies funded with Emergency Solutions Grant (ESG) funding or NYS Solutions To End Homelessness Program (STEHP) funding should also be entered into HMIS. All time-limited future rent subsidies funded with the City of Yonkers' Emergency Rental Assistance Program (ERAP) are entered into HMIS. WCDSS enters all households receiving Shelter Supplement payments into HMIS. Finally, all homeless families in Westchester who are approved for 9-year Emergency Housing Voucher payments through NYS DHCR are entered into HMIS. In each case the amount paid and the time period covered should be entered into HMIS.

The RSP contractor will check HMIS to see if any rent subsidies are being made for an applicant household. If so, the RSP contractor will contact the funding agency to ensure that payments do not overlap for any month. As stated above in our definition of our RSP-targeted populations in our response to Question #3, target groups # 3, 4, and 6 consist of groups who are losing eligibility for rent subsidies through other rent subsidy programs including Rapid Rehousing programs, Westchester's locally-funded Keys To A Home housing subsidy program, and Westchester's existing Shelter Supplement program.

As an additional safeguard, our RSP contractor will submit a list of names preliminarily approved for RSP subsidies to their WCDSS contract manager before releasing determination notices to any applicant households or their landlords. The WCDSS contract manager will check the list of names against those of Temporary Assistance households receiving rent subsidies, including Shelter Supplement, as recorded in the Welfare Management System (WMS). This has more up-to-the-minute data entry for rent subsidy payments approved by WCDSS. Checking WMS for duplicate payments before determination letters are sent will provide an extra level of protection against duplicate payments.

13) 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.

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Our RSP contractor will store a complete set of key client records in ClientTrack, Westchester's Homeless Management Information System (HMIS). ClientTrack is a product of Eccovia, Inc. Westchester County has been using ClientTrack for over 20 years. The Westchester CoC receives HUD funds that cover most of the cost of operating the HMIS. WCDSS manages the WCCoC contract with Eccovia that pays for an effectively unlimited number of user licenses. Eccovia maintains the ClientTrack system in the cloud with multiple redundant servers and backup systems. WCDSS also manages the WCCoC contract that funds our HMIS Coordinator, Daniel Gore Consulting, Inc. Mr. Gore manages our local system, oversees user credentials, monitors data quality, generates custom reports, and trains new users.

The RSP client records stored in ClientTrack will include the following:

- Unique client identifying information,
- Client household demographics,
- Documentation of all eligibility requirements, including household composition and household income, and
- Eligibility determination letters, including all RSP approval notices, denial notices, and discontinuance notices.

These HMIS records will be password protected. Access will be restricted to authorized personnel approved to access specific provider's records, WCDSS staff assigned to oversee RSP and its associated Coordinated Entry process, our HMIS Coordinator, Daniel Gore, and outside agencies approved by the WCCoC's Data and Systems Committee.

The RSP contractor will also be required to maintain a complete set of RSP client files stored in locked file cabinets. These paper files will include all of the information stored in ClientTrack plus more detailed case notes detailing all client contacts, housing plans and related correspondence.

The WCDSS contract with the selected RSP contractor will include a stipulation that the RSP contractor must maintain the complete set of paper case records for a minimum of six years following submission of the final expenditure report.

14) 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.

The WCDSS contract with our selected RSP contractor will include a stipulation that the contractor must maintain at least quarterly contact with each participating household to monitor continued eligibility. A full recertification of all eligibility requirements will be conducted by the RSP contractor annually for each participating household.

The RSP contractor will be responsible for preparing and certifying the accuracy of the quarterly reports that will appropriately follow the report template provided by OTDA. The reports will include all required data elements, including the amount of rental supplement payments

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provided, the number of households served and certain demographic information including receipt of TA and household composition. We anticipate that all of the required information can be entered into ClientTrack and will thus be easily accessed as needed for the quarterly reports.

The RSP contractor will submit a draft of the required quarterly reports to the WCDSS staff person assigned to monitor our RSP contractor's performance. That WCDSS staff person will review the draft quarterly report, retain a copy of it, and forward the signed original as directed to OTDA.

15) 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:

a. How the RSP will be different from their current approved Shelter Supplement Plan:

Westchester's proposed NYS Rental Supplement Plan program will differ from our existing Shelter Supplement program in three main ways:

1. Our proposed RSP subsidies will NOT be contingent upon continued eligibility for Temporary Assistance. This is particularly important because it will remove an unintended disincentive that currently impacts Shelter Supplement subsidy recipients trying to work their way out of poverty through employment. Shelter Supplement recipients who go to work become ineligible for Temporary Assistance and therefore lose their Shelter Supplement subsidies at incomes well below the incomes required to sustain adequate permanent housing. This loss of benefits can happen at wages as low as a half-time job at minimum wage. This creates an "eligibility cliff" they must leap over in a single bound, from a half-time minimum wage job to a job that pays enough to sustain permanent housing in Westchester's high-priced housing market. Unable to make this leap, many customers remain trapped in poverty and frequent episodes of homelessness.

In contrast, in our proposed Rental Supplement Program, recipients will have their amount of subsidies phased out gradually as the household's income rises, and the RSP subsidies will not zero out until the household's income is sufficient to afford the entire rent with only 30% or less of the household's monthly income, thus meeting HUD's recommended standard for long-term housing sustainability.

Another advantage of our RSP subsidies not being dependent upon continued eligibility for Temporary Assistance is that we will be able to adequately house families with mixed immigration status. Westchester currently has a number of homeless families in which some or all of the minor children were born in this country and are U.S. citizens entitled to homeless assistance, but all of the adults in the family are undocumented and therefore not eligible to be included in the household size when calculating Temporary Assistance permanent housing allowances. This has left these families trapped for long periods in our local emergency shelter system. We propose to target at least 50% of the new RSP subsidies to families and singles in our emergency shelter system, particularly targeting

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those who are least likely to qualify for HUD Continuum of Care Permanent Supportive Housing (PSH) subsidies based on severity of the eligible client’s long-term disabilities and least likely to qualify for HUD Continuum of Care Rapid Rehousing (RRH) subsidies based on the eligible client’s employment history and recent income. This high-need and currently underserved group will include families with mixed immigration status who have been in our shelter system longest.

2. A second major difference is that Westchester’s current Shelter Supplement program and the proposed NYS Rental Supplement Program target different populations. Our RSP Plan identifies six specific populations targeted for RSP. Each of these six populations is currently not adequately served by our current mix of available housing subsidies available for all sources including HUD-funded Continuum of Care programs and our current Shelter Supplement program. None of the six populations targeted for RSP are specifically targeted by our current Shelter Supplement program.
3. A third major distinction is that RSP will provide much deeper subsidies than are available through our current Shelter Supplement Program. They are not directly comparable because Shelter Supplement subsidies are based on the number of individuals in the household while Rent Supplement Program subsidies are based on the number of bedrooms in the subsidized housing unit. The table below illustrates the different subsidy rates available through the two programs. It roughly aligns the two programs, with a 1-person household in a studio, a 2-person household in a 1-bedroom unit, a 3-person household in a 2-bedroom unit, etc. The last line of the table shows the considerable difference in the amounts of the two subsidy types.

Comparison of 2022 Shelter Supplement vs. RSP Subsidies								
Program	Basis/ Amount							
Shelter Supplement	Family Size	1-person	2-person	3-person	4-person	5-person	6-person	7-person
	Amount	\$677.50	\$785.00	\$1,065.00	\$1,197.50	\$1,332.50	\$1,392.50	\$1,452.50
NYS RSP	Unit Size	Studio	1-BR	2-BR	3-BR	4-BR	5-BR	6-BR
	Amount	\$1,150.05	\$1,331.10	\$1,600.55	\$2,020.45	\$2,279.70	\$2,621.40	\$2,963.10
Variance		\$472.55	\$546.10	\$535.55	\$822.95	\$947.20	\$1,228.90	\$1,510.60

b. The process established to ensure funds are not duplicated:

Our RSP contractor will make the initial preliminary determination of which households appear to be eligible for RSP subsidies. Part of the contractor’s applicant screening process will be to check our HMIS to see if other rent subsidies have been entered into HMIS. All Continuum of Care Permanent Housing Subsidies and Rapid Rehousing Subsidies should be entered into HMIS. All Rapid Rehousing subsidies funded with Emergency Solutions Grant (ESG) funding or NYS Solutions To End Homelessness Program (STEHP) funding should also be entered into

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HMIS. All time-limited future rent subsidies funded with the City of Yonkers' Emergency Rental Assistance Program (ERAP) are entered into HMIS. WCDSS enters all households receiving Shelter Supplement payments into HMIS. Finally, all homeless families in Westchester who are approved for 9-year Emergency Housing Voucher payments through NYS DHCR are entered into HMIS. In each case the amount paid and the time period covered should be entered into HMIS.

The RSP contractor will check HMIS to see if any rent subsidies are being made for an applicant household. If so, the RSP contractor will contact the funding agency to ensure that payments do not overlap for any month. As stated above in our definition of our RSP-targeted populations in our response to Question #3, target groups # 3, 4, and 6 consist of groups who are losing eligibility for rent subsidies through other rent subsidy programs including Rapid Rehousing programs, Westchester's locally-funded Keys To A Home housing subsidy program, and Westchester's existing Shelter Supplement program.

As an additional safeguard, our RSP contractor will submit a list of names preliminarily approved for RSP subsidies to their WCDSS contract manager before releasing determination notices to any applicant households or their landlords. The WCDSS contract manager will check the list of names against those of Temporary Assistance households receiving rent subsidies, including Shelter Supplement, as recorded in the Welfare Management System (WMS). This has more up-to-the-minute data entry for rent subsidy payments approved by WCDSS. Checking WMS for duplicate payments before determination letters are sent will provide an extra level of protection against duplicate payments.

c. How participating households will be distinguished:

Westchester's NYS Rental Supplement Program will be set up as a separate "program" in our ClientTrack HMIS. Our RSP contractor will enter each approved participant household into the RSP program. This will enable HMIS reports to be generated for the client numbers, client demographics, and program expenditures made for this specific program for any specific time period.

The WCDSS staff person assigned to oversee the RSP contractor's contract with WCDSS will make a notation in the Case Notes section of WMS to indicate that the household's status (approved, denied, or discontinued).