



COVID-19 EMERGENCY HOUSING ASSISTANCE PROGRAM

Guidebook

Administered by the Office of Community Development
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The City of Saratoga Springs does not discriminate on the basis of age, race, color, gender, religion, handicap, sexual orientation, familial status or national origin in employment or the provision of services.

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Program Objectives

The COVID-19 Emergency Housing Assistance Program (CEHAP), administered by the City's Office of Community Development (OCD), was funded by a U.S. Department of Housing and Urban Development (HUD) grant through the Coronavirus Aid, Relief and Economic Security (CARES) Act. These funds were disbursed to Community Development Block Grant (CDBG) entitlement communities, including Saratoga Springs, to aid our community in preventing, preparing for, and responding to coronavirus.

The City of Saratoga Springs recognizes that preventing homelessness, as well as rehousing our homeless population in a non-congregate setting, is best practice for the prevention and mitigation of the spread of COVID-19. This preventative measure enables compliance with public health directives requiring social distancing as well as access to hygienic and separate bathing facilities during the COVID-19 pandemic. In the event an individual does become symptomatic, it also allows for adequate isolation during a 14-day quarantine.

CEHAP will fund up to the current HUD-established emergency payments cap in emergency housing needs for low-moderate income Saratogians - preventing homelessness for those at risk, and rapidly rehousing those without adequate housing. The program also provides support to participating non-profit human service providers who work with citizens in need of housing assistance to facilitate the application process and provide supportive services during the experience of homelessness, eviction process and housing stabilization period.

**Guidelines may be updated to reflect future HUD requirements, mandates, guidance, or established best-practices.*

Scope

A minimum of 13, and up to 39, Saratoga Springs households are expected to be assisted with rapid rehousing support or emergency rental assistance via CEHAP.

Applications are accepted on a rolling basis. Should grant funding be exhausted, a waitlist will be maintained by OCD for the duration of the program. If more funding becomes available, the City may utilize the waitlist.

Level of Assistance

Financial assistance via CEHAP is currently limited to a one-time payment of one to six (1-6) months of rental costs. Monthly rent limits are based on HUD established Fair Market Rates (FMR) for the Albany-Schenectady-Troy Metropolitan Statistical Area:

| 2020 HUD FMR | |
|--------------|---------|
| 1 bedroom | \$855 |
| 2 bedrooms | \$1,054 |
| 3 bedrooms | \$1,313 |
| 4 bedrooms | \$1,428 |

** As of April 2020. FMR updated by HUD yearly.*

Additionally, [Participating Providers](#) will provide those seeking CEHAP aid with application assistance and wrap-around services consistent with their established services to ensure individuals and families remain stably housed.

Advertising

The public will be notified of assistance available through CEHAP via a coordinated social media campaign (including [Participating Providers](#)), press releases, printed materials, and through agencies belonging to the Saratoga County Housing Alliance (southern tier of the Saratoga-North Country Continuum of Care).

Eligibility

Applicants must be a low-moderate income household (80% AMI or below: Albany-Schenectady-Troy MSA), be connected to and referred by a [Participating Provider](#) and:

| Rapid-Rehousing | Emergency Rental Assistance |
|--|---|
| <ul style="list-style-type: none"> present as "homeless" within the City | <ul style="list-style-type: none"> be in "imminent risk of homelessness" or "at risk of losing housing" |
| <ul style="list-style-type: none"> have confirmed source of future income to maintain housing | <ul style="list-style-type: none"> have confirmed source of future income to maintain housing |
| | <ul style="list-style-type: none"> be a City resident |
| | <ul style="list-style-type: none"> have a COVID-19 related lapse in income |
| | <ul style="list-style-type: none"> be in good standing as of March 1, 2020 |
| | <ul style="list-style-type: none"> have confirmation from landlord that CEHAP assistance will cure issue |

| 2020 HUD Income Guidelines | | |
|----------------------------|-----------------------|------------|
| | MAXIMUM ANNUAL INCOME | |
| | LOW | MODERATE |
| HOUSEHOLD SIZE | | |
| 1 person | \$ 33,950 | \$ 54,350 |
| 2 persons | \$ 38,800 | \$ 62,100 |
| 3 persons | \$ 43,650 | \$ 69,850 |
| 4 persons | \$ 48,500 | \$ 77,600 |
| 5 persons | \$ 52,400 | \$ 83,850 |
| 6 persons | \$ 56,300 | \$ 90,050 |
| 7 persons | \$ 60,150 | \$ 96,250 |
| 8 or more persons | \$ 64,050 | \$ 102,450 |

* AS OF APRIL 2020. INCOME LIMITS ARE UPDATED BY HUD YEARLY.

| HUD Criteria for Defining Homeless | | |
|------------------------------------|--------------------|--|
| Category 1 | Literally Homeless | <p>Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning;</p> <ul style="list-style-type: none"> Has a primary nighttime residence that is a public or private place not meant for human habitation; Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, and local government programs); or |

| | | |
|------------|---------------------------------------|---|
| | | <ul style="list-style-type: none"> Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering the institution. |
| Category 2 | Imminent Risk of Homelessness | <p>Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> Residence will be lost within in 14 days of the date of application for homeless assistance; No subsequent residence has been identified; and The individual or family lacks the resources or support networks needed to obtain other permanent housing. |
| Category 3 | Homeless under other Federal statutes | <p>Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who;</p> <ul style="list-style-type: none"> Are defined as homeless under the other listed federal statutes; Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; Have experienced persistent <i>Instability</i> as measured by two moves or more in the preceding 60 days; and Can be expected to continue in such status for an extended period of time due to special needs or barriers. |
| Category 4 | Fleeing/Attempting to Flee DV | <p>Any individual or family who;</p> <ul style="list-style-type: none"> Is fleeing, or is attempting to flee, domestic violence; Has no other resources; and Lacks the resources or support networks to obtain other permanent housing. |

At Risk of Losing Housing Criteria: Low-moderate income individuals or families with a rental arrears balance that cannot feasibly be paid with their current resources. During a period of state or locally declared moratorium on evictions, emergency rental assistance applicants may prove they are “**at risk of losing housing**” by providing a rent demand letter from the landlord. When not in a state of moratorium, applicants will be required to provide a notice of eviction.

| CEHAP Eligibility By Component | |
|--------------------------------|---|
| Rapid Re-housing | <p>Applicants defined as Homeless under the following categories are eligible for Rapid Rehousing assistance.</p> <ul style="list-style-type: none"> Category 1- Literally Homeless Category 3- Homeless Under Other Federal Statutes Category 4- Fleeing/Attempting to Flee DV |

| | |
|-----------------------------|---|
| Emergency Rental Assistance | <p>Applicants defined as Homeless under the following categories are eligible for emergency rental assistance.</p> <ul style="list-style-type: none"> • Category 2- Imminent Risk of Homeless • Meet “At Risk of Losing Housing” Criteria |
|-----------------------------|---|

***Households with a member who is documented as being at high-risk for severe COVID-19 infection will be prioritized.**

Duplication of Benefits

A duplication of benefits (DOB) occurs when an applicant (1) receives assistance from multiple sources intended for the same purpose, (2) the amount of assistance provided exceeds the total identified need, or (3) when assistance is provided for a particular cost if another source of financial assistance is available to fully pay for that same cost. **Applications must demonstrate that no duplication of benefits will result from the disbursement of CEHAP funds** (in accordance with the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5155)).

Approved CEHAP applications will demonstrate that all other possible, comparable sources of governmental funding have been exhausted, or the applicant has been denied assistance or been deemed ineligible for these funding sources.

Existing comparable funding sources may include, but are not limited to:

- Temporary Assistance or NYS ESG-CV via Saratoga County Department of Social Services
- Solutions to End Homelessness Program (STHEP) via CAPTAIN Community Human Services, Transitional Services Association, or Wellspring
- HOME via Rebuilding Together Saratoga County
- Supportive Services for Veteran Families (SSVF) via Veterans and Community Housing Coalition or Soldier On
- NYS Homes and Community Renewal COVID Rent Relief Program

Participating Providers - Role & Responsibility

All CEHAP applicants must work with a Participating Provider to access funds. Any non-profit human service agency operating within the City of Saratoga Springs with the demonstrated capacity to fulfill the role and responsibilities as outlined below is eligible to contract with the City as a CEHAP Participating Provider.

Participating Providers shall sign a Memorandum of Understanding (MOU) with the City agreeing to fulfill the following:

- Verify the client’s eligibility for CEHAP assistance and work with them to complete the application and gather required documentation.
- Notify ineligible applicants of CEHAP denial within 5 days of initial application. Such notifications must be documented.

- Assist the client in demonstrating the absence of duplication of benefits, including facilitating the application process for other possible sources of funding. *If it is determined by the City or HUD, that DOB has occurred, the total of those funds are due back to the City.*
- Communicate directly with the OCD on behalf of the client.
- Actively participate in arranging, coordinating, monitoring, and delivering services related to meeting the housing needs of clients and help them obtain housing stability. This may include, but is not limited to:
 - Assessing clients to determine eligibility for mainstream benefits and connecting those participants who are eligible with the appropriate offices of the Saratoga County Department of Social Services
 - Assistance with obtaining employment and/or job training.
 - Referrals to other pertinent community human service providers.
 - Check-in six (6) months after housing placement for follow-up.
- In the case of rapid rehousing:
 - Work with the client to identify and secure **affordable** housing (less than 30% of client's income).
 - Facilitate lead-based paint evaluation for any housing built before 1975 by a certified lead provider (24 CFR 576.403(a)). Federal procurement regulations must be adhered to and documented.
 - Work with City (or pertinent municipality) to verify unit meets HUD Housing Quality Standards (HQS). This may include the procurement of a third-party inspector if municipality is not able to confirm HQS (24 CFR 576.403(c)). Federal procurement regulations must be adhered to and documented.
 - Developing an individualized housing plan including a path to permanent housing stability.
- Maintain individual applicant records for a period of three (3) years and submit to onsite review of said records as needed (typically once - during the current program year).
- Provide quarterly reports to OCD including, but not limited to, number of referrals, number of clients served, basic demographics, housing provided, case management services, service linkage, and other reporting as needed.
- Provide payments directly to housing provider and inspector (as needed) and submit reimbursement requests to the OCD on a quarterly basis.
- Accept payment from the City for program delivery per each completed AND funded assistance request on a quarterly basis. Rapid rehousing applications will earn a \$500 program delivery fee, and emergency rental assistance applications will earn a \$250 program delivery fee.
- Utilize their respective agency's Confidentiality Practices and Procedures with all CEHAP files, cases, and activities. It is incumbent on all staff associated with CEHAP activities to adhere to their agency's confidentiality policy and senior management of the agency to enforce all aspects of the policy. Confidentiality extends to all records pertaining to any individual provided assistance and the address or location of any assisted housing will not be made public, except to the extent that this prohibition contradicts a pre-existing privacy policy of the Participating Provider.
- Adherence to all Federal statutes as required by HUD.

Nondiscrimination and Equal Opportunity Requirements

CEHAP and its Participating Providers shall comply with all applicable fair housing and civil rights requirements in 24 CFR 5.105(a). In addition, Participating Providers must make known that CEHAP rental assistance, rapid rehousing and associated services are available to all on a nondiscriminatory basis and ensure that all citizens have equal access to information about CEHAP and equal access to the financial assistance and services provided under this program. Among other things, this means that OCD and each Participating Provider must take reasonable steps to ensure meaningful access to programs to persons with limited English proficiency (LEP), pursuant to Title VI of the Civil Rights Act of 1964 and the City's Language Assistance Plan (LAP).

In addition, all notices and communications shall be provided in a manner that is effective for persons with hearing, visual, and other communications related disabilities consistent with section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR 8.6. If the procedures that OCD and Participating Providers intend to use to make known the availability of the rental assistance and services are unlikely to reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for CEHAP assistance and services, OCD and Participating Providers shall establish additional procedures that will ensure that such persons are made aware of the rental assistance and services.

Affirmatively Furthering Fair Housing

CHEAP and its Participating Providers shall affirmatively further fair housing opportunities for classes protected under the Fair Housing Act. Protected classes include race, color, national origin, religion, sex, disability, and familial status. Examples of affirmatively furthering fair housing include: (1) marketing the program to all eligible persons, including person with disabilities and persons with limited English proficiency; (2) making building and communication that facilitate applications and service deliver accessible to person with disabilities (see, for example, HUD's rule on effective communications at 24 CFR 8.6); (3) providing fair housing counseling services or referrals to fair housing agencies; (4) informing participants of how to file a housing discrimination complaint, including providing the toll-free number for the Housing Discrimination Hotline: 1-800-669-9777; and (5) recruiting landlords and service providers in areas that expand housing choice to program participants.

Application Forms and Required Documentation

OCD is responsible for developing application forms and associated documentation requirements that are responsive to CEHAP guidelines and eligibility requirements. OCD is authorized to make changes and updates to said applications and documentation requirements from time to time as needed.