

Jackson County Implementation of U.S. Department of Treasury Emergency Rental Assistance Program (ERAP)

The U.S. Department of Treasury has allocated \$11,550,205 to Jackson County “to assist households that are unable to pay rent and utilities due to the COVID-19 pandemic.” Community Services League, with offices in Blue Springs, Grain Valley, Independence, and Oak Grove, in regional coordination with United Way of Greater Kansas City, proposes to oversee the ERAP in Jackson County.

Background Information About the ERAP

From the Department of Treasury (<https://home.treasury.gov/policy-issues/cares/emergency-rental-assistance-program>)

Eligibility

An “eligible household” is defined as a renter household in which at least one or more individuals meets the following criteria:

- 1) Qualifies for unemployment or has experienced a reduction in household income, incurred significant costs, or experienced a financial hardship due to COVID-19;
- 2) Demonstrates a risk of experiencing homelessness or housing instability; and
- 3) Has a household income at or below 80 percent of the area median.

Rental assistance provided to an eligible household should not be duplicative of any other federally funded rental assistance provided to such household.

Eligible households that include an individual who has been unemployed for the 90 days prior to application for assistance and households with income at or below 50 percent of the area median are to be prioritized for assistance.

Household income is determined as either the household’s total income for calendar year 2020 or the household’s monthly income at the time of application. For household incomes determined using the latter method, income eligibility must be redetermined every 3 months.

Available Assistance

Eligible households may receive up to 12 months of assistance, plus an additional 3 months if the grantee determines the extra months are needed to ensure housing stability and grantee funds are available. The payment of existing housing-related arrears that could result in eviction of an eligible household is prioritized. Assistance must be provided to reduce an eligible household’s rental arrears before the household may receive assistance for future rent payments. Once a household’s rental arrears are reduced, grantees may only commit to providing future assistance for up to three months at a time. Households may reapply for additional assistance at the end of the three-month period if needed and the overall time limit for assistance is not exceeded.

Application Process

An application for rental assistance may be submitted by either an eligible household or by a landlord on behalf of that eligible household. Households and landlords must apply through programs established by grantees. In general, funds will be paid directly to landlords and utility service providers. If a landlord does not wish to participate, funds may be paid directly to the eligible household. Households and landlords should not submit applications for assistance to Treasury.

Jackson County Implementation

United Way of Greater Kansas City will serve as a regional convener of rental assistance recipients, will serve as a bi-state, multi-jurisdictional advocate for our area, and will coordinate data activity to ensure equitable access to assistance funds and ensure no duplicative assistance. United Way will help message the regional impact of these funds. United Way will provide:

- Technical assistance in the development of application forms, work flow, policies and procedures, partner agreements and reporting;
- Ongoing convening of the nonprofit partners involved in the distribution of ERAP funds;
- Information, referral and pre-screening of applicant through United Way 211;
- Assistance with program monitoring to ensure that funds are distributed within the timeline prescribed by the Treasury Department.

In Jackson County, the Community Services League will:

- Serve as subgrantee to the County and work with United Way and a group of Jackson County nonprofits to implement ERAP in the municipalities of Jackson County outside of Kansas City (as well as unincorporated Jackson County);
- Deploy a multi-agency team of caseworkers responsible for application review and approval of requests for rent and utility assistance;
- Manage administration of a centralized application portal that will provide both a method for seeing assistance and a vehicle for meeting the substantial documentation burden set forth by the federal government;
- Develop and implement a system for compliance review and conduct ongoing compliance review of applications as they are processed;

CSL will sub-contract (pending acceptance) with Lee's Summit Social Services, Raytown Emergency Assistance Program, Metro Lutheran Ministry, Grandview Assistance Program, Citizens Civic Relief Commission of Sugar Creek, Hope House, Salvation Army and United Way of Greater Kansas City to connect the funds to end users. CSL reserves the right to change this list of providers based on provider performance, and our region's success or challenges in connecting households to assistance. Memoranda of Agreement will be written with this flexibility in mind.

The primary job of the sub-contractors is to process the applications and ensure compliance with all paperwork, verify unemployment status, verify household income, and to provide case management services. The sub-contractor should provide information about: additional family stability resources,

connection to mainstream or pandemic benefit programs, information about job training resources, and/or financial coaching.

There will be two websites for information and application – www.jackscountyrap.org (English) and www.jacksoncountyrap.org/espanol (Spanish).

Applications

CSL will utilize its applicant portal (powered by Zoho Forms and Zoho Desk) to solicit applications. There will be one application used for all of Jackson County (including KCMO). A few details about applications:

- The standard, web-based application will be in both English and Spanish
- Paper copies of the application will be made available, but if a paper application is made, it will be transcribed by a Case Manager into Zoho.
- Those not able to access the internet, or needing other special assistance, will be encouraged to come in person to a participating agency and will be provided a computer or tablet to fill out the application and, as needed, receive assistance from a caseworker.
- A telephone application option will also be implemented, in which an applicant speaks to an application navigator over the phone to get an application submitted.
- Applicants must furnish documentation to support the requirements outlined by the Department of Treasury. This includes, but isn't limited to, an invoice from the landlord detailing the delinquent charges, a W-9 from the landlord, documentation proving unemployment, or documentation detailing all earned and unearned income for workers in the household.

Work Flow

As stated above, “Eligible households that include an individual who has been unemployed for the 90 days prior to application for assistance and households with income at or below 50 percent of the area median are to be prioritized for assistance.” It will be the priority of this effort in Jackson County to help those who meet the above criteria.

CSL and its partner agencies will broadly solicit applications beginning March 15, 2021, through the ERAP website. A multitude of strategies will be used, including social media, printed ads, outreach to media outlets, etc. to promote the applications. Processing of applications will begin on March 22, 2021. CSL will not “route” applications to providers until March 22, 2021, at 9:00 a.m. At that time, providers will work through their applications, giving priority to applicants that meet the priority criteria above. Only after meeting all priority applications may an agency move to other applicants that meet the criteria.

CSL staff will monitor and review every application received in Jackson County. CSL will route the application to the most appropriate service provider, based on agreed-upon criteria. The majority of applications will be routed based on the zip code of the applicant, but some may be routed based on existing volume sent to a service provider, primary language, and/or other special accommodations needed. Each partner agency will declare a primary contact, who will be the official liaison with CSL and its Zoho database.

Payments

For the purpose of equitable distribution, it shall be the initial working policy of CSL and United Way of Greater Kansas City, in Jackson County, to pay rental and utility arrears—including the current month—and the upcoming month for all qualifying applicants. In addition, forward-payment of rent will be made for households in the two priority groups identified below.

Payments will only be made directly to the landlord and/or utility company. The law allows payments to be made to individuals if a landlord won't accept payment. In the rare case that happens, CSL will have authority to make the decision to make payment to a household. All reasonable efforts will be made to engage the landlord.

As part of this effort, all landlords and utility companies will be asked to agree to waive all late fees and penalties, in order to stretch the fund dollars as far as possible. If a landlord/utility provider refuses to do so, CSL has the authority to allow payment of late fees and penalties.

Households facing imminent eviction will receive priority assistance under the program in an expedited fashion as needed. For example, a household with an eviction judgment

This program will not:

- Pay delinquent rent that is in collection without a clear agreement, documented in writing, that payment of rental debt to a landlord will result in a satisfied judgment in the view of the Circuit Court
- Pay mortgage payments
- Pay rent from one spouse to another, pay rent from a child to a parent, or pay rent from one joint owner of a house to the other joint owner of a house, unless a lease can be produced. For example, a non-married couple that jointly own a house can't claim that one partner owes "rent" to the other without a lease.

Federal Priority Populations

The federal legislation that authorized the ERAP stipulates that state and local programs prioritize service to two groups: those who have household income at or below 50% of Area Median Income and those who have been unemployed 90 days or longer.

CSL and UWGKC will develop protocols for prioritizing these two populations and implement that protocol across the partner nonprofits. Under considerations for the prioritization protocols include:

- 1.) Conducting the review of applications from these two groups at a faster pace than applications from households outside them. For example, we could route applications to caseworkers from priority applicants on a daily basis, but route other applicants on an every-other-day or weekly basis, resulting in a process that enables priority applicants to have their applications at a slightly faster rate.
- 2.) Providing a higher level of financial assistance to these two groups than applications from households outside them. For example, the federal legislation allows for (but does not require) prepayment of rent for up to three months at a time, in addition to covering rental arrears. We

may provide three months of assistance for these priority populations but refrain from paying forward any months for other applicants, or only pay forward one month.

As we finalize details around the method to be used to prioritize these two populations, we will share the with County leadership.

Jurisdiction

For all intents and purposes, the funds outlined in this document can support residents of the following Jackson County jurisdictions:

Blue Springs
 Blue Summit (unincorporated Jackson County)
 Buckner
 Grain Valley
 Grandview
 Greenwood (only the portion located in Jackson County - north of SW County Line Rd/Spruce Dr)
 Independence
 Lake Lotawana
 Lake Tapawingo
 Lee's Summit (only the portion located in Jackson County - north of SW County Line Rd/155th St)
 Levasy
 Lone Jack
 Oak Grove
 Pleasant Hill (only the portion located in Jackson County - north of E County Line Rd/155th St)
 Raytown
 Sibley
 Sugar Creek
 Unincorporated Jackson County

CSL, its partner organizations, and United Way of Greater Kansas City will consult with the County on questions of residency. The County will appoint one contact person to help discern addresses in question (namely the Blue Summit area, south Lee's Summit, south Greenwood, south Pleasant Hill, the Raytown area, and areas of the County that border Lafayette County and Cass County).

Policies and Protocols to Ensure Compliant and Consistent Implementation

United Way and Community Services League are working on additional program components that will be put in place before the program launches, including:

Appeals policy – a formal means by which an applicant household can appeal a denial of a request for assistance

Privacy policy – a policy for the protection of the privacy of applicants and the handling of personally identifiable information

Duplication of Benefit – a written protocol for use by partners processing applications to ensure—prior to final approval—that the applicant has not already received assistance from another government assistance program for the same need (i.e., ensuring that the same month’s bill isn’t being paid by this program and another program)

Strategy for over-the-phone applications – a clearly defined method for an applicant to submit a request, with assistance by a caseworker, over the phone, and alternative plans for submitting supporting documentation (e.g. drop-off of documents vs. being uploaded via the online platform)

Strategy for in-person applications - a clearly defined method for an applicant to submit a request, with assistance by a caseworker, in person

Proposed Budget

Total funding: \$11,550,205.00

Amount eligible for housing stability services and administrative expenses (up to 10%): \$1,155,020.00

Amount to be spent on rent/utility payments: \$10,395,185.00

Housing Stability Services and Administrative Expenses

While not binding, CSL and UWGKC expect to allocate the following dollars for Housing Stability Services and Administrative Expenses:

UWGKC Coordination & 2-1-1 Call Center	\$250,000
Help Desk - Designated Staff with dedicated email/phone, both English and Spanish	\$75,000
Accounting - CSL & UWGKC	\$150,000
Grandview Assistance Program	\$45,000
Lee's Summit Social Services	\$45,000
Raytown Emergency Assistance Program	\$45,000
Salvation Army	\$45,000
Hope House	\$25,000
Advertising	\$50,000
Community Services League	\$400,000
Additional Expenses	\$25,020
TOTAL	\$1,155,020

CSL and UWGKC expect all partners to need to hire additional case management and administrative staff to oversee such a large volume of work. While we propose no “per capita” distribution, we will aim to achieve some equal distribution of the dollars. Based on population and level of need (level of need calculations shown below), we anticipate the following approximate monetary distribution:

<u>City/Entity</u>	<u>Amount of Assistance</u>
Blue Springs	\$1,499,747
Buckner	\$105,657

Grain Valley	\$302,418
Grandview	\$848,205
Independence	\$4,012,559
Lee's Summit	\$2,018,524
Oak Grove	\$229,232
Raytown	\$1,005,945
Sugar Creek	\$114,158
Hope House	\$258,740
Total	\$10,395,185

Hope House is receiving a special allocation to assist with victims of domestic violence in Jackson County. We are rolling Lake Tapawingo into Blue Springs, Lake Lotawana Lone Jack, and Greenwood into Lee's Summit, unincorporated Jackson County into Independence, Buckner, Oak Grove, and Lee's Summit.

From www.census.gov, here is a listing of the poverty level of each community (% based on total population of 360,246):

City	Population	% of EJC Pop	Poverty Rate %
Blue Springs	55,829	15.50%	7.2
Buckner	3,045	0.85%	23.5
Grain Valley	14,526	4.03%	4.9
Grandview	24,445	6.79%	14.6
Independence	116,672	32.39%	15.1
Lee's Summit	99,357	27.58%	4.6
Oak Grove	8,258	2.29%	10.5
Raytown	28,991	8.05%	12
Sugar Creek	3,290	0.91%	18.5

From www.census.gov, here is a listing of the median household income in each community, the percentage of homeowners, and the percentage of renters:

City	MHI	% renters	% homeowners
Blue Springs	\$75,767.00	28.70%	71.30%
Buckner	\$54,291.00	Not shown	Not shown
Grain Valley	\$73,698.00	35.40%	64.60%
Grandview	\$47,103.00	50.80%	49.20%
Independence	\$50,592.00	39.30%	60.70%
Lee's Summit	\$89,969.00	22.80%	77.20%
Oak Grove	\$64,398.00	34.00%	66.00%
Raytown	\$52,662.00	38.10%	61.90%
Sugar Creek	\$53,475.00	Not shown	Not shown

Using the above data, and seeing a correlation with high percentages of renters and high percentages of poverty, these communities are projected to receive an amount of money equal to 120% of their per capita funding levels: Buckner, Grandview, Independence, Raytown, Sugar Creek. These communities are projected to receive an amount of money equal to 95% of their per capita funding level: Blue Springs, and Oak Grove. Based on having lower rates of poverty and lower percentages of renters, these communities would receive approximately 75% of their per capita allocation: Grain Valley, and Lee's Summit.