

RESIDENTIAL RENTAL ASSISTANCE PROGRAM

Policies and Procedures Manual

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I. General Provisions

This manual provides the policies and procedures of Montclair Township Residential Rental Assistance (RRA) program. This document provides standard concepts, definitions and procedures concerning program administration. This manual is designed for use as a reference and resource and will be updated as needed to reflect changes in policies and procedures.

The RRA program makes available an initial amount of \$60,000 in funds to assist households that are unable to pay rent. Montclair Township will offer aid to income-eligible households located within the geographical boundaries of the Township who have been economically impacted through job loss, furlough or reduction in hours or pay. RRA is a grant program wherein rental payments are made on behalf of an income-eligible household to the landlord for a maximum period of 12 months to maintain housing and/or to reduce rental payments in arrears. Assistance will be available for monthly rent payments and rental arrearages.

II. Available Assistance

A. Type of Assistance

Montclair Township is providing RRA grants to eligible households through an application process. The funding provided will assist with payment of rent and rental arrears. The program administrator shall determine the duration and amount of rental assistance provided to eligible households based on application information, monthly rent due, and amount in arrears. This duration and assistance amount will be designed to ensure households are provided with the maximum benefit possible. Prospective rental assistance will be provided up to a maximum of 3 months at a time, before recertification of income and/or reapplication is required, for a period not to exceed 12 months.

B. Terms of Assistance

Rental assistance will include:

- a. Monthly Payment made on behalf of eligible household to landlord/property management agent for 3 months' rent up to a maximum of 12 months; or
- b. Monthly Arrears Payment made on behalf of eligible household to landlord/property management agent for rent; or
- c. Monthly payment combination of items a. and b. made on behalf of eligible household to landlord/property management agent.

Rental assistance will not be paid directly to households except in cases where the landlord does not agree to participate in the program. The RRA program administrator must make reasonable efforts to obtain the cooperation of landlords to accept payments from the RRA program. Outreach will be considered complete if a request for participation is sent in writing, by certified mail, to the landlord, and the addressee does not respond to the request within 14 calendar days after mailing; or, if the grantee has made at least three attempts by phone or email over a 10 calendar-day period to request the landlord or utility provider's participation; or a landlord confirms in writing that the landlord does not wish to participate. The final outreach attempt or notice to the landlord must be documented. The payments will be made

by Montclair Township to the bona fide landlord/property management agent or company.

After all reasonable efforts have failed to obtain the cooperation of the landlord, the Township shall make payments directly to the household. The tenant must provide proof of payment to the landlord to the program administrator.

III. Applications

A. Applicants

An applicant may be either a renter or landlord. The Applicant shall provide the following information to be considered as an eligible household:

1. Name, address, telephone number and e-mail address of applicant, including status as either a renter or landlord.
2. Full names and ages of all occupants of the eligible household (whether related or unrelated) living in the residence and proper identification (photo ID, social security card, birth certificate) for all household members.
3. An applicant household must reside in a rental property located within the geographical boundaries of Montclair Township. The applicant must provide a copy of current lease agreement or self-attestation in the absence of a lease agreement to confirm residency.
4. Household Income must be below 80% AMI. Proof of income for all members of the household as required in Section IV must be provided.
5. Rental payment status – Amount in arrears or prospective.
6. Proof of economic hardship. Applicant must provide banking information for the months behind in rent to verify that the tenant does not have the income to pay down arrears or pay current rent.
7. Current PSE&G bill to verify utilities are being paid as required by lease.
8. Signature of the primary applicant(s), certifying that the information provided related to the annual household income and occupants is correct.

B. Household

A Household is defined as one or more individuals who are obligated to pay rent on a residential dwelling. The occupants may be a single family, one person living alone, two or more families living together, or any other group of people who share living arrangements. The term “eligible household” means a household of one or more individuals who are obligated to pay rent on a residential dwelling and:

1. One or more individuals within the household has qualified for unemployment benefits for the 90 day period preceding the date of the application; or
2. The household has a household income that is not more than 80 percent of the area median income.

C. Occupancy

Applicant must provide proof of occupancy. All occupancy documentation must show residency

at the subject address for the period for which rental payments are requested through the RRA program. Acceptable proof includes:

1. Copy of electric, gas, or water bill; or
2. Letter from electric, gas, or water company.; or
3. Other qualified documents may be presented for consideration of proof of occupancy, which include but are not limited to a voter registration card or a driver's license.

D. Justifying Economic Hardship

Applicant households must submit documentation confirming economic hardship for the 90 day period preceding the application. The program administrator must document that one or more members of the applicant's household **who signed the lease agreement** and who are obligated to pay rent on the residential dwelling either:

1. Qualified for unemployment benefits. If relying on this determination, the applicant will submit a signed attestation or other relevant documentation regarding the household member's qualification for unemployment benefits.
2. Experienced a reduction in household income, incurred significant costs, or experienced other financial hardship due. If relying on this determination, the applicant will submit a signed attestation that one or more members of the household meets this condition.

Acceptable documentation sources are:

1. If due to workplace closure or reduced hours, including lay-off, termination, loss of working hours, income reduction resulting from business closure or other employer issues for the period for which rental payments are requested through the RRA program:
 - A copy of household member(s) notification of job loss/termination from employer; or
 - A copy of household member(s) notification of furlough from employer; or
 - A copy of household member(s) notification confirming reduction in hours and/or pay; or
 - A copy of household member(s) application and/or approval for Unemployment Insurance benefits; or
 - A signed self-certification that includes the name of the household member who is self-employed, the name and nature of the business, and narrative confirming economic impact on self-employment.
2. Documentation of sickness or caring for a household or family member who is sick;
3. Documentation of extraordinary out-of-pocket childcare expenses, medical expenses, or health care expenditures of the tenant or a member of the tenant's household;
4. Documentation of any additional factors relevant to the tenant's reduction in income.

E. Duplication of Benefits

The RRA payments may not be duplicative of any other state or federally funded rental assistance provided to an eligible household. All applicants must provide a signed self-

certification (electronic accepted) that includes the names of household members and a narrative confirming that no other federal rental assistance has been received during the period for which the rental payments were due. The program may verify the accuracy of all self- certifications.

IV. Income Determination

Income is determined in each household in two ways (household income):

1. The household's total income for calendar year 2023, as determined using the adjusted gross income (AGI) as defined for purposes of reporting under the IRS Form 1040 series for individual Federal annual income tax purposes, or
2. Sufficient confirmation, as determined by the Secretary of the Treasury, of the household's monthly income at the time of application for such assistance.
 - a. The Township will consider all income received in the two months prior to application.
 - b. Applicants using the monthly income method must provide self-certification of their income amounts in addition to any other income documentation available.
 - c. For household incomes determined using this method, income eligibility must be reconsidered every 3 months. Households may reapply for additional assistance at the end of the three-month period, if needed, and if the overall time limit for assistance is not exceeded.

To determine program eligibility, all sources of income for each household member over the age of eighteen and the exact amounts earned from each income source must be accurately documented through one of the methods described above. The primary applicant(s) are also required to certify by signature that the information provided regarding household members is correct. The primary applicant is responsible for providing this documentation as part of eligibility consideration.

Eligible households must be at or below the 80% of area median income (AMI) or "Low Income" limits for confirmed household size, and priority will be given to those applicants at or below 50% of AMI or "Very Low." See chart below.

A. Priority Assistance

Renter households that qualify as very low income (less than 50% AMI) and/or households in which one or more member is unemployed and has been unemployed for 90 days will be given priority. At the time of disbursement, recipients that are very low income and/or households in which one or more member is unemployed and has been unemployed for 90 days will have their funds disbursed first. The remaining funds will then be disbursed to qualified low income applicants.

V. Implementation Procedures

Montclair Township will follow a three-step process to implement the program:

A. Intake Phase

The purpose of the intake phase is to collect applications, required documents, and forms from applicants (tenants and landlords). The full intake phase will allow for the applicant to submit all required and relevant documentation to establish eligibility for funding and determine an award amount. Once an applicant has submitted all required documentation and forms, a program administrator will be assigned to the application and a confirmation notice will be sent to the applicant.

The RRA program will include safeguards for the protection of personally identifiable information (PII) for all applicants. All staff members who process application information are trained in dealing with PII. Applications, documents, and forms will be stored in the system of record and can only be accessed by staff members.

Application Status

The applicant household's initial eligibility for rental assistance will be determined upon first consultation, but the Township will not move forward with submission of a completed application until all required information and documents are provided. After initial review of the application, the applicant is given 7 business days to provide the additional required documents. If the required documents are not provided within 7 days, the case is closed and the applicant must reapply.

After the application is complete and submitted, the program administrator will review application information and provide an eligibility determination as quickly as is practicable. At any time during the process, if an applicant becomes unresponsive, the program administrator will send an unresponsive letter to the applicant and mark the applicant's file in the system as unresponsive. Unresponsiveness is defined as an applicant not responding to requests for documents, e-mails, and phone calls for a period of three consecutive calendar weeks.

At any time during the process, if an applicant indicates a desire to voluntarily withdraw from the program, the program administrator will ask the applicant to submit a withdrawal letter, have the system send a withdrawal letter, and mark the applicant's file in the system as an applicant voluntary withdrawal from the program.

The program administrator will ensure timely communication of application status to those who have submitted applications. A notice will be sent to each applicant if the application is incomplete, and documents or forms are still needed to be submitted to complete the intake phase. Only after all required documents and forms have been submitted by the applicant will a program administrator be assigned to the application to verify program eligibility. At this time, a notice will be sent to the applicant that their application is complete and will be reviewed for program eligibility.

Initial Eligibility Review

The program administrator will conduct an automatic review of the application and ensure the applicant is in preliminary compliance with the following:

- The rental location is within the geographical boundaries of Montclair Township.
- Self-reported income is within program eligibility limitations.
- Applicant is either a Renter or Landlord of record.

- Applicant provides a copy of current lease agreement or self-attestation in the absence of a lease agreement.
- Applicant certifies they have been financially impacted by loss of employment or subjected to reduced income for the 90 days prior to making the application.

An approved applicant file shall contain all submitted information and documentation necessary to meet all required eligibility criteria and contain completed forms, documentation, and necessary information for all members of an applicant household. Once the verification process is completed and if basic applicant eligibility is established, the Program Administrator will approve the pre-application and an email will be generated to the applicant and the Township. This email will notify the applicant of their initial eligibility and include the program telephone number and any associated program personnel identification, including the Program Administrator's contact information:

If the applicant does not have email and/or internet access, program personnel will contact the applicant at the phone number(s) they provided and will provide documentation with the above- mentioned information follow-up via U.S. Mail.

Applicants who do not qualify for assistance will be notified via phone at the number(s) they provided and will be sent a follow-up denial letter via U.S. Mail, which will cite the specific basis for the denial. A denied applicant file shall contain all submitted information and documentation, as well as the reason for denial (ex: over income limits, incomplete information, reside outside Montclair Township). The denial letter will also provide the applicant the process for appealing the denial and any other available information regarding additional and/or supplemental assistance resources.

B. Eligibility Review

This section outlines the procedure to apply the eligibility requirements as laid out in the statute and in the eligibility section of this document. The following are threshold requirements, which must be met for an applicant to be eligible for assistance. Eligibility does not guarantee assistance, since it is expected that there will be more eligible applicants than can be served with available funds. In each given week that funds are not available to serve all eligible applicants, renter households that qualify as very low income (less than 50% AMI) and/or households in which one or more member is unemployed and has been unemployed for 90 days will have their funds disbursed first.

Eligibility Review Procedure

After the initial eligibility review is completed, the program administrator will begin the formal eligibility review process:

1. During the formal eligibility review process the program administrator will verify:
 - a. Identity of applicant;
 - b. Eligible location of residence; and
 - c. Income Qualification.
2. Applicants who do not qualify for assistance after the formal eligibility review process will

be notified via email or mail which will cite the specific basis for the denial. The denial letter will also provide the applicant the process for appealing the denial and any other available information regarding additional and/or supplemental assistance resources.

3. After eligibility is verified, the program administrator will conduct a duplication of benefits analysis, based on self-certifications from the applicant.
4. Once the duplication of benefits analysis is completed and the applicant still has identified unmet needs, the program administrator will recommend the applicant for approval and will identify the eligible amount for rent and for each eligible utility.
5. The program administrator will mark the file for revalidation in 2.5 months until the applicant reaches their 12-month payment limit.
6. The file is submitted for approval by the Montclair Township Department of Planning and Community Development.
7. The program administrator will maintain an up to date project spreadsheet which will provide information on all applications recommended for review and approval.

C. Approval and Payment

1. The Montclair Township Director of Planning will review the spreadsheet submitted for approval. The spreadsheet will contain:
 - a. Case number;
 - b. Verified size of Household;
 - c. Verified household Income;
 - d. Level of income;
 - e. If the household has one or more members is unemployed and has been unemployed for 90 days;
 - f. Amount of rental assistance;
 - g. Duplication of Benefits findings; and
 - h. Combined number of months of assistance provided.
2. The Planning Director will approve or disapprove each application.
3. For those applications not approved by the Planning Director, the application will go back to the program administrator to address whatever issues were raised.
4. For those applications approved, the Planning Director will prepare a Purchase Order for approved rental assistance payment to the Montclair Township Purchasing Department for checks to be issued to the respective landlords.

VI. Program Oversight

The Montclair Township Housing Commission will provide policy and overall program oversight of the Montclair Township RRA Program. The Housing Commission will review the following:

RRA Program Policy and Procedures Manual

- Any proposed changes to the RRA Program Policy & Procedures Manual;
- Any matter that must go to the Township Manager or Council to include contracts and change orders;
- Any appeals from actions taken by the Director of Planning; and
- Monthly program status reports.