

# ULA INCOME SUPPORT FOR RENT-BURDENED AT-RISK SENIORS AND PERSONS WITH DISABILITIES PROGRAM GUIDELINES

Draft for Consideration by the United to House LA Citizen Oversight Committee  
July 22, 2024

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## INTRODUCTION

### 1. Program Summary

#### a. Goals and Requirements

The Income Support for Rent-Burdened At-Risk Seniors and Persons with Disabilities Program (Income Support Program) provides income assistance to Acutely Low Income (ALI), Extremely Low Income (ELI), and Very Low Income (VLI) renters<sup>1</sup> — specifically, rent-burdened households with seniors and/or persons with disabilities that are at risk of homelessness<sup>2</sup> — in order to prevent them from being displaced from their home.

The Income Support Program is intended to be implemented in coordination with other United to House LA (ULA) Homelessness Prevention Programs and other services focused on eviction prevention and promoting housing stability. These Income Support Program Guidelines shall apply to ULA-funded activities related to the implementation of the Income Support Program by the City, including activities conducted by City Departments or any Contracting Partners that may be procured consistent with *Section 5* of these Guidelines.

The goals of the Income Support Program are to prevent displacement and foster housing stability for lower income, rent-burdened, at-risk seniors and/or persons with disabilities by mitigating the effects of income instability on those households through the provision of income support. This Income Support Program will build on the BIG:LEAP program, the City's pilot guaranteed basic income program, contributing to the further research and understanding of the impacts of basic income programs, supplementing work that is being done at the federal and state levels. In this way, the Program seeks to uplift the city's most vulnerable residents out of poverty, connect them to the vast network of resources, aid them in their path to financial security, stabilize their housing, and ultimately increase their overall health and well-being.

#### b. List of subprograms or activities

Consistent with the ULA measure and ordinance, the Income Support Program is a financial assistance program for rent-burdened ALI, ELI, and VLI households with seniors or people with disabilities that are at risk of homelessness. The Program provides direct cash assistance to qualifying tenants. Priority eligibility is established in *Section 3.3* of these Income Support Guidelines. Promotion of the Income Support Program will be coordinated with other ULA Homelessness Prevention Programs.

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<sup>1</sup> Income categories are defined by the California Health and Safety Code.

<sup>2</sup> "At-risk of homelessness" is defined as households with past due rent or an eviction warning notice, Unlawful Detainer filing, unsafe or unhealthy living conditions, or any other household debts that serve as evidence of such risk, or that meets the definition under § 576.2 of the ESG Program Interim Rule and § 578.3 of the CoC Program Interim Rule.

## 2. Context

The ULA measure and ordinance requires ten percent (10%) of the annual ULA Program revenue be dedicated to the Income Support Program as a core strategy to prevent homelessness.

According to the 2022 American Community Survey (ACS) 5-year estimate, there are approximately 886,998 renter households in the City, with an estimated 130,000 (14.6%) having a member who is a senior, of which an estimated 83,000 senior renters are rent burdened. While there are existing programs that provide cash and supportive services to some seniors in the City of Los Angeles (an estimated 1,000 seniors receive Los Angeles County General Relief,<sup>3</sup> most of whom are homeless; 64,000 seniors receive In-Home Supportive Services, and 35,000 seniors receive Supplemental Security Income<sup>4</sup>), it is rarely enough to ensure stable housing.

As of March 31, 2024, approximately 24,000 eviction cases are filed each year in the City, disproportionately targeting Black and Latinx tenants, especially seniors and persons with disabilities, with many resulting in homelessness. As of May 2024, approximately 4,000 seniors in the City are homeless on any given night,<sup>5</sup> imposing extreme hardship on the person unhoused and substantial costs on local and state governments, including but not limited to the costs of emergency shelter, interim and long-term housing, hospital-backed health care, and transportation costs.

Most tenants' inability to pay rent is triggered by the confluence of several factors, including but not limited to, rising housing costs, low and/or fixed income, age and/or disability which strongly correlate with housing instability. The Income Support Program is intended to prevent the potentially disruptive consequences of these factors by providing direct cash assistance to qualifying rent-burdened at-risk seniors and/or persons with disabilities.

## 3. Commitment to Racial Equity

Existing data and scholarship confirm that Black, Latinx, and other communities of color are disproportionately affected by evictions and homelessness. These Income Support Program Guidelines acknowledge that this disproportionality is the result of generations of structural racism. Decades of land use policies, zoning practices, and the confluence of rising housing costs, low and/or fixed income, age, and disability have reinforced racial segregation, poverty, environmental injustice, and disinvestment that is manifested in the demographics of our contemporary homeless population.

As ULA seeks to combat homelessness through a variety of interventions, the implementation of the Income Support Program is specifically designed to promote racial equity, with a focus on preventing homelessness for rent-burdened at-risk seniors and

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<sup>3</sup> L.A. County General Relief payments are \$221 per month. Eligibility is limited to people whose monthly net income is less than \$221 per month.

<sup>4</sup> The maximum Supplemental Security Income payment is \$943 per month.

<sup>5</sup> 2024 City of LA Homeless Count.

<https://www.lahsa.org/documents?id=8152-city-of-los-angeles-hc2024-data-summary>

persons with disabilities by making direct cash assistance available to the City's most vulnerable communities.

Consistent with this commitment to promote racial equity, the Income Support Program is designed to be attuned to the needs and realities of historically marginalized communities, and how racism, as well as disability, transphobia, sexism, and other tenant experiences affect the vulnerability of a tenant, and their experiences.

#### 4. Program Metrics

The Program Administrator and Contracting Partners will, on an ongoing basis, collect information and metrics in alignment with the ULA measure and ordinance reporting requirements and in a manner that supports the evaluation of long-term impacts and outcomes for the Income Support Program. To the extent feasible, this information includes but is not limited to, number of applications filed and approved, number of households supported, and amount of income support provided. Wherever relevant, data shall be disaggregated by race, family composition, sexual orientation, age, ability, gender, and location (address, zip code, and Council District).

Goal	Metrics
Provide housing stability to lower income rent-burdened households with seniors and/or persons with disabilities by mitigating the effects of being At-Risk of homelessness, through the provision of direct cash assistance.	<ul style="list-style-type: none"> <li>● Number of applications filed in the Income Support Program portal</li> <li>● Number of Applications for Income Support Program approved</li> <li>● Number of Applications for Income Support that did not receive funding</li> <li>● Average household income of approved applications for Income Support Program funding</li> <li>● Average amount of funding</li> </ul>

Consistent with *Section 5.3* of these Income Support Program Guidelines, The Los Angeles Housing Department (LAHD) shall analyze these metrics and participant data annually and provide a summary of its analysis to the ULA Citizens Oversight Committee (COC) to allow for an assessment of whether the Income Support Program is meeting its goals and priorities.

## SECTION 1: PROGRAM ADMINISTRATION

### 1.1 Program Administrator

The City shall administer the Income Support Program. The LAHD General Manager, or designee, shall be designated as the primary Income Support Program Administrator (Program Administrator), and may collaborate with other key City Departments, including the Department of Aging (DOA), the Department of Disability (DOD) and the Community Investment for Families Department (CIFD). At their discretion, the LAHD General Manager may delegate and/or revoke administrative responsibilities to Contracting Partners and/or appropriate partner City Departments.

### 1.2 Selection Process

The Income Support Program is to be administered by LAHD, partner City Departments, and any designees, consistent with *Section 1.1* above. Any program partners or outside entity charged with implementing any portions of the Program, including the Contracting Partners, shall be procured as described in *Section 5*.

## SECTION 2: GENERAL PROVISIONS

### 2.1 Eligible Participants

The Income Support Program shall serve tenants (inclusive of individual tenants and tenant households) in the City seeking direct cash assistance. Eligible Participants must meet all of the following criteria:

1. Household must reside in the City of Los Angeles and continue to reside in the City throughout the duration of assistance.
2. One or more individuals within the household must be a Senior and/or a Person with Disability, defined as follows:
  - a. Senior – a person who is at least 65 years of age or older at the time of application.
  - b. Person with Disability – a person who has a physical or mental impairment that substantially limits one or more major life activities, such as hearing, seeing, speaking, walking, breathing, performing manual tasks, caring for oneself, learning, or working.
3. Gross household income must be at or below 50% of the Area Median Income (AMI), as of December 31st of the year prior to the application date, as defined by California Health and Safety Code.

4. Household must have experienced being rent-burdened, defined as paying more than 30% of total household income for rent each month, as of December 31st of the year prior to the application date.
5. Household must attest to being At-Risk of Homelessness, as defined below:
  - a. At-Risk of Homelessness – a household with past due rent or an eviction warning notice, Unlawful Detainer filing, unsafe or unhealthy living conditions, or any other household debts that serve as evidence of such risk, or that meets the definition under § 576.2 of the ESG Program Interim Rule and § 578.3 of the CoC Program Interim Rule.

Eligible Participants shall not include landlords, master tenants, or homeowners.

## 2.2 Eligible Forms of Funding

Funding shall be allocated in the form of direct cash assistance to Eligible Participants, consistent with the Program Requirements described in *Section 3*. Funding may also be expended to facilitate Eligible Activities, as further defined and discussed in *Section 2.3*, through contracts, purchase orders, and other contracting mechanisms that are consistent with City requirements and approved by the Program Administrator.

At its discretion, the Program Administrator, the Mayor, or the City Council may seek to allocate additional funding for this Income Support Program, including but not limited to potential grants, consistent with the City's general restrictions and requirements. Any additional funding allocated to these Program activities shall not change or limit in any way how ULA funding is allocated or administered.

## 2.3 Eligible Activities

Eligible Activities of the Income Support Program are limited to the payment of direct cash assistance, in the form of unrestricted income support, to Eligible Participants.<sup>6</sup> Program activities may additionally include benefits counseling services with qualified service providers and Contracting Partners, as well as referrals to case management and/or navigation services, for the purposes of assisting Eligible Participants with enrollment in other social services programs. Additional detail regarding these activities is provided in *Section 3.1, Scope of Services*.

Activities not identified in this *Section 2.3* may still be determined to be Eligible Activities consistent with the Income Support Program, subject to the discretion of the Program Administrator.

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<sup>6</sup> These Income Support Program Guidelines acknowledge that disbursements made directly to tenants may result in unintended benefit reduction consequences for those tenants, though conclude that the competing priority of ensuring tenants avoid being at-risk is paramount. Direct disbursements to tenants shall be transmitted with an acknowledgement of potential benefit reduction consequences, and wherever possible, paired with benefits counseling resources.

## 2.4 Ineligible Activities

Any provision of services to landlords or property owners, is expressly prohibited under this Program.

City employees and their direct family members, or the employees or direct family members of any party contracting with the Program Administrator to support the administration of the program, are ineligible for participation in the Income Support Program. For the purposes of this prohibition, “direct family members” shall be defined as any dependents, household members, parents, siblings, or spouses, or any other such family member as defined by applicable City regulations. Any Application or potential disbursement of funds to City employees and/or their direct family members, or the employees or direct family members of any party contracting with the Program Administrator to support administration of the program, shall be considered an Ineligible Activity warranting rejection of an application.

Current and prior applicants who submit fraudulent or altered documentation or information will automatically become ineligible for the program.

## 2.5 Program Funding – Caps and Limits

The ULA measure and ordinance allocates ten percent (10%) of overall annual program revenue to the Income Support Program. Funding allocated to the Income Support Program shall be apportioned and prioritized for the Eligible Activities identified in these guidelines subject to the approval, discretion, and delegation of the Program Administrator.

Any household receiving funding disbursement consistent with these Income Support Program Guidelines is limited to receiving no more than the total maximum amount of cash assistance as established for that Application Period.

## 2.6 Timing and Frequency of Awards

Eligible Participants shall submit applications for Income Support Program funding (Applications) through a web-based portal established by the Program Administrator, its designee, or its Contracting Partners (Application Portal). The Application Portal shall be accessible in multiple languages.

Subject to the same time limitations further identified in this *Section 2.6*, the Program shall also accept Applications through modes and mediums other than the Application Portal, including by phone and at physical locations where the tenant may be provided assistance completing the Application. Representatives at physical locations shall provide additional technical assistance to help applicants in completing their application.

Contingent on available funding, the Program Administrator may establish multiple application periods per year, or may accept applications on a rolling basis, during which time Applications may be accepted (Application Period). The length of each Application Period shall be defined prior to its commencement. Contingent on funding availability, the program may accept applications on a rolling basis. In such an event, the Application Period shall be considered indefinite.

## **SECTION 3: PROGRAM REQUIREMENTS: SERVICES AND FUNDING PRIORITIES**

### **3.1 Scope of Services**

The Program Administrator, and any other entity it contracts with for these purposes, shall effectuate these guidelines and provide services necessary for the execution and performance of the Eligible Activities identified in *Section 2.3* of these Income Support Program Guidelines.

#### Funding Disbursements

Payments shall be made directly to the Eligible Participant, upon verification of eligibility criteria and selection based on Funding Priorities described in *Section 3.3*. The Income Support Program will provide recurring monthly payments, in an amount to be determined prior to the onset of each Application Period. Contingent on ultimate implementation design and funding availability, total disbursements may be limited to a period ranging from twenty-four (24) to sixty (60) months, or may be provided to the Eligible Participant for an indefinite period.

Payment amounts described above will be adjusted annually to account for inflation using the Consumer Price Index (CPI-U) for the Los Angeles-Long Beach-Anaheim area, or, if such index ceases to be published, using an equivalent index chosen by the Program Administrator.

#### Benefits Counseling

Eligible Participants selected to receive Income Support payments shall be provided access to benefits counseling services in advance of receiving payments, and as needed, throughout enrollment. Benefits counseling will ensure participants are sufficiently aware of the impact of the cash payments on their continued eligibility for existing public benefit programs, and allow participants to make informed decisions about participating in the Income Support Program.

In addition, interested participants shall be intentionally and proactively referred to other public benefits and social services programs for which they may be eligible, in order to access additional resources. Participants may be referred to other programs that include assistance with case management, food, transportation, employment, mental and physical health services, legal services, and housing navigation.

Counseling should be accessible to every program participant; reasonable accommodations should be provided via appropriate interpretation, modification and/or facilitation of these services to ensure equal access.



### 3.2 Program Budget

ULA allocates ten percent (10%) of overall annual program revenue to the Income Support Program. Funding will be allocated consistent with *Sections 2.3* and *3.1* of these Income Support Program Guidelines. Funding allocated to the Income Support Program shall be apportioned and prioritized for the Eligible Activities identified in these guidelines subject to the approval, discretion, and delegation of the Program Administrator.

### 3.3 Funding Priorities

Funding allocated to the Income Support Program shall be apportioned and prioritized for the Eligible Activities identified in these Income Support Program Guidelines subject to the approval, discretion, and/or delegation from the Program Administrator.

#### Use of Funds

As provided in *Section 2.1* of these Guidelines, Eligible Participants for the Income Support Program shall include rent-burdened households with seniors and/or persons with disabilities that are acutely low income, extremely low income, or very low income, and are at-risk of becoming homeless.

Within these parameters, Applications for direct cash assistance submitted consistent with *Section 2.6* of these Income Support Program Guidelines will be reviewed and evaluated based on the Priority Factors identified below in order to establish application priority. Prior to the commencement of each Application Period, the Program Administrator and ULA Citizens Oversight Committee (COC) shall establish a weighting methodology for the purposes of ranking the Priority Factors. Disbursement of Income Support Program funding shall prioritize Applications from Eligible Participants based on the Priority Factors.<sup>7</sup>

Priority factors shall include, but are not limited to:

- Tenant households with income at/or below 30% AMI.
- Tenant households that are severely rent burdened, defined as paying more than 50% of total household income for rent each month.
- Tenant households that have an open case with the City Department of Aging, or the City Department of Disability, or the State of California Adult Protective Services agency.
- Tenant households residing in units located in high displacement risk ZIP codes.
- Tenant households with a prior history of homelessness.
- Tenant households with long-term tenancies (at least six continuous years) in rental units subject to the City's Rent Stabilization Ordinance (RSO).
- Tenant households residing in units that are deed-restricted affordable units, or other subsidized affordable housing.
- Tenant households that are receiving housing choice vouchers.
- Tenant households with a history of eviction or pending/active eviction notices.

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<sup>7</sup> If the Program Administrator and COC do not establish a new weighting methodology for prioritization prior to an opening of an Application Period, the previous approved methodology shall remain in effect.

The COC may, in its discretion, recommend additional factor(s), consistent with findings from periodic Needs Assessments required per Los Angeles Administrative Code Section 22.618.6(c)(2) and program reporting, in order to better align the Program Guidelines with areas of identified high need and better achieve the goals of ULA, as provided in Los Angeles Administrative Code Section 22.618.6(c)(10). Inclusion of additional factor(s) at that time shall have the effect of amending this *Section 3.3* of these Income Support Program Guidelines, with additional factor(s) carried forward as Priority Factor(s) in subsequent Application evaluations, unless 1) the COC subsequently removes that factor(s), or 2) in implementing the factor(s), the COC establishes a sunset period for that factor(s) at that time.

The COC may consider establishing Income Support Program Priority Factors in tandem with Short-Term Emergency Assistance Program priorities to maximize strategies to prevent homelessness and displacement of the City's most vulnerable demographics and populations.

#### **SECTION 4: IMPLEMENTATION PLAN**

The Program Administrator shall identify the number and required level of experience of necessary staff to administer the day-to-day responsibilities of the Income Support Program, and seek to fill those positions expediently. Further, the Program Administrator shall identify opportunities to synergize, collaborate, and/or consolidate implementation of the Income Support Program with other City departments, County of Los Angeles departments, and the Los Angeles Homeless Services Authority (LAHSA). Lastly, the Program Administrator shall also work with appropriate partners to understand how to minimize negative impacts on publicly funded benefits including but not limited to Medi-Cal, Medicare, CalFresh, General Relief, and/or Supplemental Security Income, and work to ensure those negative impacts are minimized through Program design and delivery. Upon availability of funds, adoption of these Income Support Program Guidelines, fulfillment of staffing needs, identification of appropriate partnerships with LAHSA and other County departments, and mechanism to minimize negative impacts on benefits, the Program Administrator shall finalize Program implementation parameters and identify a date for the Application Period to open.

#### **SECTION 5: CONTRACTUAL SERVICES**

At its discretion, the Program Administrator may contract some or all of the responsibilities necessary to effectuate these Income Support Program Guidelines to a third party program administrator, or Contracting Partner(s). Any procurement activities shall be conducted consistent with the City Administrative Code and relevant City and Department policies. Upon completion of any existing contract term, the Program Administrator may consider extending the term of that contract consistent with the terms of the existing agreement or conducting a competitive bid for Income Support Program services, consistent with the City's competitive bidding requirements.

## 5.1 Evaluation and Selection Process

Should the Program Administrator delegate contract responsibilities to a third party, the award of any contract for Income Support Program services shall be based on a best value competitive bid. Prior to release of a Request for Proposals (RFP), the Program Administrator shall establish a scoring system assigning values to the following criteria (at minimum), and rating responses to proposals accordingly:

- 1) Experience and approach to providing services set forth in *Sections 2.3 and 3.1* of these Income Support Program Guidelines.
- 2) Experience with and approach to providing services to similar communities as those that would receive income support and services under these Income Support Program Guidelines.
- 3) A cost proposal for solicited services.

The COC may consider recommending an integrated RFP process that allows service providers to bid for multiple Homelessness Prevention Programs under the same ULA-funded contract.

## 5.2 City Living Wage Ordinance

All contractors shall comply with the Living Wage Ordinance, Los Angeles Administrative Code Section 10.37 et seq., as amended from time to time. Contractors further shall agree to comply with federal law proscribing retaliation for union organizing. Any subcontract entered into by a contractor for work to be performed under these Program Guidelines must include an identical provision.

## 5.3 Data Collection and Reporting

Consistent with *Section 4* of the *Introduction* to these Income Support Program Guidelines, information regarding the number of applications filed (and approved) in the Income Support portal, the amount of funding disbursed subject to approved applications, and other related metrics shall be compiled and provided to the COC within ninety (90) days after the closure of an Application Period.

Should the Program Administrator, at any time, accept Applications on a rolling basis, the information identified in this *Section 5.2* shall be compiled and provided every ninety (90) days during pendency of that rolling Application Period, and within ninety (90) days after the closure of that rolling Application Period.

This information includes, but is not limited to:

- Number of applications filed in the Income Support Program portal.
- Number of Applications for Income Support Program approved.
- Number of Applications for Income Support that did not receive funding.

- Average household income of approved applications for Income Support Program funding.
- Average amount of funding.

In addition to ongoing program reporting, the Program Administrator may conduct additional Program evaluation, including partnering with researchers or academic institutions to study and assess the long-term impacts of the Program on participants and their outcomes.

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