



Working Draft Concept Document for Public Input for the Risk Mitigation Policy

Draft

2/13/2019

**The assistance provided under this policy is contingent upon appropriation of funds by
City Council and the allocation of resources to implement this policy.**

All assistance is subject to the availability of funds.

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SUMMARY OF ASSISTANCE

If your household...	You may be eligible for...
<ul style="list-style-type: none"> Is forced to move from an apartment or mobile home park due to redevelopment, rehabilitation, or a code enforcement action against the property owner 	<p>Up to \$3,000 (multi-family) or \$7,000 (mobile home) for:</p> <ul style="list-style-type: none"> Coverage of moving-related expenses, including deposits for your new rental unit or site preparation cost for mobile home Housing counseling and resource referral for supportive services
<ul style="list-style-type: none"> Is experiencing an increase in rent that is twice the City average and results in your housing no longer being affordable 	<p>Up to \$3,000 (multi-family) or \$7,000 (mobile home) for:</p> <ul style="list-style-type: none"> Coverage of moving-related expenses, including deposits for your new home Housing counseling and resource referral for supportive services
<ul style="list-style-type: none"> Is experiencing an emergency hardship that has put you behind on rent or utilities 	<p>Up to \$3,500 for rent and up to \$1,500 for utilities:</p> <ul style="list-style-type: none"> One-time assistance of up to three months of rent (renters) or utility assistance (renters and homeowners) Housing counseling and resource referral for supportive services

Important Information:

- This program is for households within the city limits of San Antonio
- You'll be asked to provide information related to your income and hardship
- Your household must have a total income that is less than or equal to 100% of area median income (AMI)
- Payments will be made on your behalf to vendors such as utility companies, property managers, and movers
- This is one-time assistance for households who face displacement
- To qualify for assistance due to a rent increase, the increase must be twice the local average and your housing costs must exceed 30% of your income
- Applicant must be the primary lease or mortgage holder

I. RESIDENT RELOCATION ASSISTANCE PROGRAM (RRAP)

A. POLICY PURPOSE

To provide relocation assistance to households impacted by direct displacement due to redevelopment, rehabilitation, or a code enforcement action against the owner of the multifamily development or mobile home park in which they reside. The policy also provides relocation assistance for households who experience a significant increase in rental housing costs of the multifamily unit or the lot of their mobile home in a mobile home park in which they reside, resulting in the dwelling unit being unaffordable to the household.

B. ELIGIBILITY

Applicants must meet all the following criteria:

- a. Be a current resident of the City of San Antonio
- b. Have a household income of at or below 100% of the San Antonio-New Braunfels Metropolitan Statistical Area median income (AMI), as determined by the US Department of Housing and Urban Development (HUD)
- c. Be the primary lease holder in a multifamily unit or a lot in mobile home park within the city limits of San Antonio and meet one of the following:
 - i. Be subject to involuntarily direct displacement due to redevelopment or rehabilitation, or a code enforcement action against the property owner of the rental housing in which they reside
 - ii. Be subject to an annual rental increase at least twice the city average
 - a) The household must provide documentation demonstrating a rental rate increases of twice the average for the City of San Antonio or more within a one-year (12 month) period as determined by best available data published by NHSD and;
 - b) The proposed increase must bring total housing cost to over 30% of household income and;
 - c) Have not received relocation assistance under this program in the previous 12 months.
- d. For mobile home residents, the following criteria also apply;
 - i. The household must own the mobile home and have a tenancy of a lot in a mobile home park, or;
 - ii. The household must be in a lease-purchase, rent-to-own, seller-financed, or a similar type of agreement for the mobile home, have been making payments in accordance with this agreement,

and are able to work with the owner of the mobile home in which they live to relocate the mobile home.

C. EXCEPTIONS

This policy does not apply to the following circumstances:

- a) For relocation assistance sought for involuntarily direct displacement due to redevelopment or rehabilitation, or a code enforcement action against the property owner of the rental housing in which they reside:
 - i. A dwelling unit that is demolished or vacated because of damage caused by the household or by other events beyond the owner's control, including but not limited to fire, vandalism, natural disaster, or other destruction.
 - ii. A household that qualifies for relocation assistance under federal or state law.
 - iii. Relocation that is being provided by the property owner exceeding the requirements of this policy.
 - iv. A dwelling unit where the landlord has provided a fixed term tenancy and notified the household prior to occupancy.
 - v. A household that is occupying a dwelling unit operated as emergency or temporary shelter for persons experiencing homelessness.

- b) For relocation assistance sought due to an increase in rental costs twice the city average, the policy does not apply to the following circumstances:
 - i. Rental agreements for week-to-week tenancies.
 - ii. Renters that occupy the same dwelling unit as the owner/landlord.

D. PROCEDURE

The process of receiving relocation assistance can be initiated in two ways:

- a) Households who receive a notice to vacate or have been notified of a qualifying increase in rental costs (twice the city average) may request assistance from Neighborhood and Housing Services by submitting an application with the required documentation identified in Section I(B).

- b) Property owners who plan to issue notices to vacate or notices of rent increases greater than twice the local average are requested to partner with the City by notifying the Neighborhood and Housing Services Department (NHSD) a preferred ten (10) business days prior to issuing notices to vacate. By partnering with the City, the property owner shall:
 - i. Agree to provide written notice in English and Spanish to all residents of the disclosed units in accordance with applicable State law and provide at least the required minimum time frame to vacate the premise.

- a) The minimum time frame is 90 days for multifamily developments and 180 days for mobile home parks.
- ii. Agree to hold at least two meetings with households, in coordination with Neighborhood and Housing Services Department, to ensure households of the disclosed units are aware of the impending relocation, financial assistance availability, and the City's housing navigation services. The meetings should be held at a time and place that is convenient for the owner, NHSD, and the households who received notices to vacate.
- iii. Financial assistance is dependent of the availability of funding and households are subject to the eligibility requirements outlined in section (B) of this policy.

E. RELOCATION ASSISTANCE

- a. The rules in this section specify the types of assistance available under the Resident Relocation Assistance Program (RRAP).
 - i. Housing counseling services including referrals, and coordination with schools as needed. Referrals include those to social service agencies offering relevant services and resources and a list of housing options that are safe, decent, sanitary, affordable, and when possible, located within the household's neighborhoods of choice;
 - ii. Financial assistance for reasonable relocation and moving expenses, including the following:
 - a) Application fees for replacement housing
 - b) Application deposits for replacement housing
 - c) Security deposit at replacement housing
 - d) First month's rent at replacement housing
 - e) Rental of moving truck and movers
 - f) Moving materials such as boxes and moving pads
 - g) Outstanding utility debt or rental debt
 - h) Utility connection or disconnection fees or deposits, where these cannot be waived
 - i) Costs specific to mobile homes including
 1. Relocation of a mobile home
 2. Storage of items while the home is being transported
 3. Mobile home park fees, and

4. Site preparation (including preparing a pad, utility connections, repairs, skirting)
 - b. Households with elderly or disabled individuals are eligible to receive an additional \$500.
 - c. Households being relocated due to a code enforcement action against the owner of the multifamily development or mobile home park in which they reside are eligible to receive financial assistance for hotel stays and storage until new housing is secured, subject to the eligibility requirements in section B.
 - d. The amount of assistance for which a household is eligible will be determined by the household’s income and current housing unit type (multifamily or mobile home) in accordance with Table A. City staff shall use a scaled approach to prioritize assisting households with the greatest need.

Table A: Resident Relocation Assistance Program Allowances

Relocation Assistance*		
Income**	Multifamily	Mobile Home Park
≤ 80% AMI	• Up to \$3,000	• Up to \$7,000
81-100% AMI	• Up to \$2,250	• Up to \$5,250

* Households with elderly or disabled individuals are eligible to receive an additional \$500. Households relocating due to a code enforcement action may receive additional funding to cover hotel and storage costs until new housing is secured.

** San Antonio-New Braunfels Metropolitan Statistical Area median income (AMI) for the current year, as determined by the US Department of Housing and Urban Development (HUD).

II. EMERGENCY ASSISTANCE FOR HOUSING STABILIZATION

A. POLICY PURPOSE

To provide assistance and housing counseling services to stabilize renter and homeowner households experiencing emergency situations affecting their ability to pay rent-related and utility expenses.

B. ELIGIBILITY

Applicants must meet all the following criteria:

- a. Be a current resident of the City of San Antonio
- b. Be the primary lease or mortgage holder in a multifamily unit, mobile home, or single family home within the city limits of San Antonio
- c. Have a household income at or below 100% AMI as defined by HUD
- d. Provide documentation for the proof of hardship that renders the household's unable to pay rent or utilities as identified in Appendix I, Table C.

C. FINANCIAL ASSISTANCE

The City will conduct an assessment to determine the exact amount of financial assistance available to each household. The City in its sole discretion will determine eligible expenses and administer assistance directly to the provider.

City staff shall provide assistance based on income and use a scaled approach to prioritize assisting to households with the greatest need.

Table B: Emergency Assistance for Housing Stabilization Allowances

Emergency Assistance		
Income*	Renters	Homeowners
≤ 80% AMI	<ul style="list-style-type: none"> • Up to \$3,500 for rent and; • Up to \$1,500 for utilities 	<ul style="list-style-type: none"> • Up to \$1,500 for utilities
81-100% AMI	<ul style="list-style-type: none"> • Up to \$2,625 for rent and; • Up to \$1,125 for utilities 	<ul style="list-style-type: none"> • Up to \$1,125 for utilities

* San Antonio-New Braunfels Metropolitan Statistical Area median income (AMI) for the current year, as determined by the US Department of Housing and Urban Development (HUD).

Renters

- a. Assistance will be administered directly to the landlord/ property management on behalf of the applicant.
- b. Households will be eligible to receive up to three (3) months of rent and rent-related assistance. Assistance can only be provided once over 12 months. After the first month of assistance, if a proof of hardship persists, the household can

- receive up to two monthly rent payments, subject to an assessment conducted by Fair Housing staff.
- c. A household is eligible to receive:
 - i. Up to \$3,500 for rent-related expenses per household per 12 month period.
 - ii. Up to \$1,500 for utility expenses per household per 12 month period.
 - d. Utility assistance covers electricity or water bills only, and payment will be deposited directly to the utility companies (CPS and SAWS).
 - e. Fair housing counseling, referrals will be provided as needed. Referrals include those to social and financial service agencies offering relevant services, counseling, and resources.

Homeowners

- a. Homeowners' emergency assistance is limited to paying for utility assistance.
- b. Amount of assistance per household will be up to \$1,500 per household per 12 month period.
- c. Utility assistance covers electricity or water bills only, and payment will be deposited directly to the utility companies (CPS and SAWS).
- d. Referrals to the City's available home repair programs for households with structurally unsafe housing conditions will also be provided.
- e. Fair housing counseling referrals include those to social and financial service agencies offering relevant services, counseling and resources.

DEFINITIONS

Affordable Housing: Housing for which the household is paying no more than 30 percent of his or her income for gross housing costs, including utilities.

Area Median Income (AMI): The Area Median Income is the midpoint of a region's income distribution – half of families in a region earn more than the median and half earn less than the median. HUD determines a region's AMI annually.

Disabled: A person with a mental or physical impairment that substantially limits at least one major life activity, a record of such an impairment, or being regarded as having such an impairment.

Displaced Household: A household is considered displaced when the occupant(s) are forced to move involuntarily as a direct result of demolition or rehabilitation of all or part of the real property on which the person resides.

Dwelling Unit: A permitted unit of accommodation that is used as a residence by one or more persons who maintain a household.

Elderly: People 60 years of age or older.

Household: Any person or persons who occupy a residential unit primarily for living or dwelling purposes under a rental agreement or lease, or mortgage.

HUD: The US Department of Housing and Urban Development

Multi-Family Development: means a property with three or more residential dwelling units including but not limited to, apartments and townhomes.

Mobile Home Park: a site containing five or more structures that:

- a) are transportable in one or more sections;
- b) in travelling mode, are at least 8 feet in width or 40 feet in length or, when erected onsite, are 320 square feet or more in area;
- c) are built on a permanent chassis and designed to be used as a dwelling, with or without a permanent foundation; and
- d) Include plumbing, heating, air-conditioning, and electrical systems.

Redevelopment: The replacement, rehabilitation, or repurposing of existing improvements on an already developed site.

February 13, 2019

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Rehabilitation: Changes to an existing structure including additions, expansion, remodeling, renovation, modernization, repair, and alteration, including acquisition of new or replacement equipment.

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APPENDIX I

Table C: Criteria for the Proof of Hardship for Emergency Assistance Program for Housing Stabilization

Job/Wage Instability			Health-Related Issues		Other
Unemployment/ Termination	Income		Medical		Unexpected Expenses
	Hours Reduced	Wages Reduced	One-time support	Temporary Condition	
Termination letter from employer	Employer letter stating change in hours	Employer letter regarding wage reduction or notice of furlough	Estimate of treatment cost and hospital/or insurance bill	Receipt and discharge paperwork from hospital	Receipts of expenses incurred such as: Funeral, tow, car repair, divorce, etc.
Proof of unemployment application	Paystubs for last three pay cycles	Employer letter of current/future hours per pay period	Diagnosis paperwork (doctor's note)	Doctor's note with release date for work	
Proof client has applied for benefits		Unemployment letter/SSI benefits discontinued	FMLA paperwork, if applicable	FMLA paperwork, if applicable	