



MEMORANDUM

Date: July 29, 2020

To: The Honorable Chairman and Members
Pima County Board of Supervisors

From: C.H. Huckelberry
County Administrator 

Re: **County Response and Prevention Efforts Regarding COVID -19 Related Evictions**

The outbreak of COVID-19 in Pima County has had significant impact on those facing eviction. Governor Ducey's Executive Order 2020-14 postponed eviction actions effective March 24, 2020 for a period of 120 days. Executive Order 2020-40 continued the postponement of eviction actions until October 31, 2020. These Executive Orders recognize that individuals may face medical and/or financial challenges as a result of the pandemic that would be significantly exacerbated by eviction and potential homelessness.

A variety of Pima County processes and programs are designed to assist those facing eviction. The attached memorandum from the Community Workforce Development staff provides detailed information on a number of mitigation strategies that will be implemented to reduce to the extent possible evictions.

To summarize:

- A total of \$20.5 million from six unique funding programs has been earmarked for rental assistance such as rental and utility costs, moving and associated deposits, and related court and legal fees.
- Approximately \$700,000 has been paid to date and 4,300 rental assistance applications are currently being reviewed.
- The onset of the pandemic this past spring resulted in the submission of approximately 7,500 rental assistance applications. Next week, an additional 25 temporary employees will join the current staff of 10 to review the applications and conduct necessary interviews to ensure the timely payment of eviction prevention funds.

To ensure the rapid deployment of rental assistance and eviction prevention initiatives, six key strategies have been identified and are delineated in the attached memorandum.

Strategy 1: Fully integrate available Coronavirus Aid, Relief, and Economic Security (CARES) resources with traditional funds such as those historically provided by Community Development Block Grants and other state and federal resources.

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Strategy 2: Standardized Documents for CARES Rental and Eviction Prevention Assistance to streamline and simplify the application processes.

Strategy 3: Increase Community Action Agency capacity to facilitate the distribution of Rental Assistance.

Strategy 4: Pilot a Multi-Family Housing Property Manager Referral Process to expedite payment to renters in arrears as identified by the Property Managers.

Strategy 5: Assemble an Eviction Prevention Agency Partnership of agencies to work directly with Constables, tenants, and landlords currently engaged in the eviction process.

Strategy 6: Prioritize US Department of Housing and Urban Development Emergency Solution Grants to respond to the pandemic (HUD ESG-CV II) to those experiencing chronic homelessness.

I have also tasked a staff member of our Criminal Justice Reform Unit to coordinate actions of various County agencies including the Courts in an eviction reduction strategy. Presently a number of County agencies are involved in evictions but in a siloed manner with little coordination or communication among them. This siloed model does not produce the best results for those faced with eviction.

CHH/lab

Attachment

c: The Honorable Kyle Bryson, Presiding Judge, Superior Court
The Honorable Kristen Randall, Constable Justice Precinct 8
Jan Leshner, Chief Deputy County Administrator
Arnold Palacios, Director, Community Workforce Development
Daniel Tylutki, Deputy Director Community Workforce Development
Lisa Royal, Program Manager, Criminal Justice Reform Unit

Date: July 27, 2020

To: C.H. Huckelberry
County Administrator

From: Daniel Tylutki
Deputy Director



Arnold Palacios
Director



Via: Francisco García 
Deputy County Administrator

Re: June 16, 2020 & July 20, 2020 Memoranda Regarding Response to COVID-19 Evictions

Purpose

Per your June 16, 2020 and July 20, 2020 memoranda, staff has assembled a matrix identifying over \$20M in fiscal year 20-21 local, state, entitlement, and CARES rental assistance resources to be made available to address evictions (Attachment-A). Federal CARES funds, including Coronavirus Relief Funds (CRF), will play a critical role in addressing service and funding gaps “traditional” grant resources cannot timely address. Background facts and figures summarize and directly respond to key eviction and rental assistance questions. A brief analysis of reimbursable costs per the complex myriad of non-CARES funding sources is incorporated. In an effort to establish existing conditions as best as possible; metrics and financial outlays from the various funding sources are consolidated into tables to provide three fiscal years’ worth of data including the COVID-19 impacted months of March 2020 to present. A needs assessment is provided utilizing available rental assistance waitlist information and various court data to craft estimations to identify funding and service gaps. Finally, County strategic plans are highlighted to bolster both the Pima County Community Action Agency and non-profit community to make immediate rental assistance and eviction prevention impacts; providing stimulus to tenants, landlords, and ultimately tax-paying residents, in an effort to mitigate this potentially catastrophic COVID-19 housing national issue.

Background

Evictions have always been an ongoing issue mired in legalities and complexities, which the impacts of COVID-19 is fully exposing. Information and data to quantify the problem and identify barriers to craft mitigation strategies has been an ongoing challenge. Furthermore, pre-pandemic programmatic and fiscal resources to assist renters in the eviction process has been minimal. For better or worse, the issuance of respective moratoriums compounds, literally with interest per month, the underlying issues associated with the rental assistance and eviction processes; now with most COVID-19 impacted households unable to pay nearly six (6) months’ rent arrears. Information provided by Honorable Charlene Pesquiera, per her July 15, 2020 memorandum, provides additional insight and complements the staff analysis prepared in this report. Outlined on the next page are facts and figures to address questions and concerns identified in previous memoranda:

- ❑ 960 average evictions per month for the last 30 months per Judge Pesquiera memorandum.
- ❑ 7,800 households per year, on average, directly received utility and rent assistance by Pima County and contracted local partner agencies totaling approximately \$4M in grant fund expenditures per annum.
- ❑ Since January 2020, including the COVID-19 impacted months March through June, County has assisted:
 - 2,799 households with rent and/or utility assistance with an average of \$539.26 per family, over \$1.5M for the last 6 months.
 - A subset, 813 families received rent assistance only at an average of \$725 per household, totaling nearly \$724,661 per the last 6 months, a 20% increase with existing staff per the same term, 2019.
- ❑ 4,431 pending applications for rental assistance via the Arizona Department of Housing (ADOH) online portal. It is anticipated volume will increase with the postponement of eviction actions to October 31, 2020 and the requirement for renters to “complete” a pending application for assistance.
- ❑ 1,300 ADOH applications are in “review,” i.e. in various states of completeness, actively being worked by Pima County. Qualifying applicants are tasked by ADOH to respective the Community Action Agencies to manage. This has been a challenge for jurisdictions throughout Arizona (Attachment-B).
- ❑ 12%, statewide ADOH COVID-19 Rental Assistance Program funded completion rate.
- ❑ 134 Pima County households have qualified for ADOH assistance since March, an 11% approval rate; Maricopa County and City of Phoenix at 8% and 12% respectively.
- ❑ 25 additional County staff start work August 3, 2020 to increase application reviews by an estimated 250%.
- ❑ \$20M+ will be made available to provide rental assistance and eviction prevention grants, via 25 funding sources, to eligible County residents and participating landlords effective immediately.
- ❑ 6 rental and eviction prevention assistance strategies are being implemented:
 1. “Braid” CARES resources, including CRF, into traditional funding models to complete applications quickly, effectively filling service and funding gaps other funds do not address.
 2. Two standard documents in final draft to secure CARES funds and comply with Executive Order 2020-49 mandates to postpone eviction:
 - a. Landlord Tenant Settlement Agreement & Payment Plan
 - b. Tenant Attestation, Household Impacted by COVID-19
 3. Pima County CAA capacity to complete applications increased with additional, temporary, staff.
 4. Voluntary Multi-Family Property Management Referral Pilot in process.
 5. Eviction Prevention Agency Partnership; CRF Subrecipient contract drafted in direct consultation with Grants Management & Innovation (GMI). The purpose of the multi-agency collaboration, centered around a single fiscal agent, is to accept eviction assistance requests via multiple referral points, e.g. Constables, outside agencies, court records, renters, and most importantly, landlords.
 6. HUD Emergency Solution Grant-Coronavirus II (ESG-CV II) CARES funds prioritized for “Newly Homeless” families that have been, or will most likely be, evicted.

Available Resources

When compared to securing a first-time mortgage, applying and processing an application for rental, utility or eviction prevention assistance is even more complex for both beneficiaries and providers. Most rental and utility assistance programs - eviction prevention funding being a subset - are typically administered locally via Community Action Agencies, community-based non-profits and combinations thereof collectively serving as regional “safety-nets.” To date, the Pima County Community Action Agency (CAA), and non-profit agency partners, actively administer up to 25+ complex funding sources at any one time as summarized in Table 1 and detailed in Attachment-A. Each resource has their own specific programmatic, fiscal and reporting requirements; in addition to, applicable databases and reimbursement processes effectively increasing the complexity to timely administer such programs in times of crisis.

Table 1, Existing and Proposed Funding; Rental Assistance and Eviction Prevention

| Federal | |
|---|---------------------|
| Coronavirus Relief Fund (CRF), CAA Rental Assistance (includes 25 additional PCN) (*) | \$4,220,993 |
| CRF, Eviction Prevention Agency Partnership (*) | \$3,625,000 |
| HUD, Community Development Block Grant-CV (CDBG-CV), CAA Rent Assistance Program | \$500,000 |
| HUD, Emergency Solutions Grant-CV II (ESG CARE II), CAA Rental Assistance (*) | \$1,000,000 |
| HUD, ESG CARE II, Agency Eviction Prevention Partnership (*) | \$1,000,000 |
| HUD, ESG PY 20 Entitlement | \$15,125 |
| HUD, ESG PY 19 Entitlement | \$37,000 |
| HUD, HOME Tenant Based Rental Assistance (TBRA) Pilot | \$195,000 |
| FEMA, Emergency Food & Shelter Program (EFSP) CARES | \$164,156 |
| FEMA, EFSP Phase 37 | \$67,440 |
| Health & Human Services (HHS), Low Income Home Energy Assistance Program - CARES | \$2,164,722 |
| HHS, Community Services Block Grant (CSBG-CARES) | \$1,188,464 |
| HHS, Community Services Block Grant (CSBG) | \$815,464 |
| HHS, Low Income Home Energy Assistance Program (LIHEAP) | \$3,610,959 |
| HHS, Temporary Assistance for Needy Families/Short Term Crisis Services (TANF/STCS) | \$540,565 |
| HHS, Neighbors Helping Neighbors | \$6,210 |
| State | |
| Arizona Department of Housing (ADOH) COVID-19 Eviction Prevention & Rental Assistance (*) | \$600,000 |
| ADOH, Eviction Prevention Pilot (*) | \$280,000 |
| Arizona DES Housing Support through Sullivan Jackson Employment Center (SJEC) | \$40,000 |
| Arizona Community Action Association | |
| Wildfire, Tucson Electric Power | \$92,000 |
| Wildfire, SWG Low Income Energy Conservations (LIEC) | \$47,890 |
| Wildfire, SWG Energy Share (ES) | \$36,120 |
| Wildfire, TRICO | \$105,497 |
| Wildfire, Utility Repair Replace & Deposit (URRD) | \$69,800 |
| Pima County | |
| Emergency Eviction Intervention Prevention (*) Pima County General Fund | \$101,000 |
| Total | \$20,523,405 |

Please note that six (6) rental assistance funding sources (*) are allocated to specifically address evictions while the others are integrated into rental assistance. In regular consultation with GMI, staff has inserted proposed Pima County CRF into the County rental assistance and eviction prevention strategic implementation plan. Including all CARES resources, \$20,523,405 is available beginning July 1, 2020, and in most cases retroactive to March 2020, to provide rental assistance response to COVID-19.

Identifying Program Delivery Costs, Sources and Uses

It is not uncommon for a single household to have to individually qualify and need up to six (6) different funding sources to cover a single month of eligible rental assistance, let alone additional costs associated with the eviction process. Not including direct referrals to outside agencies or providing other “wrap-around” services in-house, significant staff time and effort is required to process applications and provide necessary case management. Summarized in Table 2 - and detailed by funding source in Attachment-A - is a chronological summary of costs typically associated with rental assistance programs, in addition to, preventive and post-eviction initiatives. With the exception of CRF, not a single funding sources covers all costs.

Table 2, Rental Assistance & Eviction Prevention Costs

| Rental and Utility Assistance Costs | Eviction Prevention Assistance Costs | Post-Eviction Assistance Costs |
|--|---|---|
| <input type="checkbox"/> Application Processing | <input type="checkbox"/> Application Processing | <input type="checkbox"/> Case Management & Funding |
| <input type="checkbox"/> Case Management & Funding | <input type="checkbox"/> Case Management & Funding | <input type="checkbox"/> Application Fees |
| <input type="checkbox"/> Past Due Rent | <input type="checkbox"/> Past Due Rent | <input type="checkbox"/> Significant Security Deposit |
| <input type="checkbox"/> Past Due Utilities | <input type="checkbox"/> Accumulating Late Fees | <input type="checkbox"/> First Month Rent |
| <input type="checkbox"/> Accumulating Late Fees | <input type="checkbox"/> Court Fees | <input type="checkbox"/> Additional Rent, if applicable |
| <input type="checkbox"/> Current Month Rent | <input type="checkbox"/> Legal Fees | <input type="checkbox"/> Moving Costs |
| <input type="checkbox"/> Future Rent | <input type="checkbox"/> Prior Judgement, if applicable | <input type="checkbox"/> Furnishings |
| | <input type="checkbox"/> Current Month Rent | |
| | <input type="checkbox"/> Future Month Rent | |
| | <input type="checkbox"/> Utility Assistance | |

Considering the unprecedented increase in the need for COVID-19 related eviction prevention and rental assistance nationally; currently prescribed funding regulations and systems are arguably unable to effectively address the sheer numbers of valid requests, especially with traditional, month-to-month, household income qualification processes. (Attachment-C provides a visual example of the algebraic calculations needed to conduct income verifications for a single month of utility and rent assistance from a traditional funding source.) As such, many jurisdictions, Pima County included, are deploying a pragmatic approach making available CRF resources to provide multiple months of assistance to initially blunt the problem; “braiding” other conventional and CARES resources as prudently and efficiently as possible, or reserving them post December 30, 2020. Across the Country, many formula based CARES’ resources are just now coming online notably FEMA, Emergency Food & Shelter Program-CV; HUD, Emergency Solutions Grant-CV I & II and others with metrics, trends and outcomes to be determined.

Existing Capacity

Since each qualifying family unit may receive multiple funding sources. In respect to time, staff has consolidated all active grant outlays to report households served, with its existing 10 FTE County and sub-recipient personnel, for the last three fiscal years to establish a baseline. As previously noted, and identified in Table 3 below, Pima County and its sub-recipients, on average across the last three years, assisted over 7,800 unduplicated households per year with either rent and/or utility assistance providing about \$500 each family.

Table 3, Rent and Utility Assistance by Quarter, Last Three Years

| Households Assisted | FY 17-18 | FY 18-19 | FY 19-20 |
|-----------------------|-------------|-------------|-------------|
| QTR 1 | 2,114 | 2,394 | 2,504 |
| QTR 2 | 2,163 | 2,067 | 2,446 |
| QTR 3 | 1,733 | 1,776 | 1,491 |
| QTR 4 | 1,566 | 1,886 | 1,308 |
| Total Assisted | 7,576 | 8,123 | 7,749 |
| Total Grants Expended | \$3,473,061 | \$4,163,612 | \$4,178,693 |
| Average Assistance | \$458.43 | \$512.57 | \$539.26 |

Typically, rental assistance is provided first and utility assistance later often as an incentive for household members to participate in additional wrap-around services, including employability training. In most instances, however, utility assistance is provided as a stand-alone program, as such, skews and decreases the “Average Assistance” per household when combined with rental programs.

In an effort to best establish a historical average for rents, *Table 4, Rental Assistance Only, Last Three Years*, factors out utility program payments to best isolate those costs for analysis.

Table 4, Rental Assistance Only, Last Three Years

| Households Assisted | FY 17-18 | FY 18-19 | FY 19-20 |
|-----------------------|-----------|-----------|-------------|
| QTR 1 | 241 | 332 | 321 |
| QTR 2 | 327 | 236 | 337 |
| QTR 3 | 368 | 302 | 371 |
| QTR 4 | 428 | 342 | 442 |
| Total Assisted | 1,364 | 1,212 | 1,471 |
| Total Grants Expended | \$853,174 | \$814,237 | \$1,066,644 |
| Average Assistance | \$625.49 | \$671.81 | \$725.11 |

In summary, at pre-COVID-19 capacity with 10+/- existing County and Subrecipient FTE’s, approximately 112 households received rental assistance per month with a FY19-20 monthly amount at \$725. Please note efforts to provide rental assistance increased in the 4th quarter FY19-20 in direct response to the pandemic. In an effort to better meet the demand for rental assistance for COVID-19 impacted households, CRF resources totaling nearly \$600,000 have been allocated to hire 25 additional, temporary, County Program Specialists to increase capacity by an estimated 250%.

Considering the current policy per existing funding sources to only provide a single one-month’s rent assistance per household application, CRF and CARES resources will be employed in conjunction with these more restrictive funds to cover all arrears and establish landlord/tenant payment plans. This initial policy will keep families stable and not perpetually overwhelm the Arizona Department of Housing (ADOH) online application system. Please note that Pima County currently does not have its own online and/or mobile friendly application system at this time and will effectively utilize and leverage the ADOH online portal as its web-based interface with rental assistance applicants.

Assessing Need, Rental Assistance & Eviction Prevention Services

All things COVID-19 consistently change; sourcing, compiling and assessing available data to establish the need for both rental and evictions prevention assistance during the pandemic is problematic. Nonetheless, it is best to review the need for rental assistance and eviction prevention, separately, to develop respective upstream and downstream strategies to complement existing policies, efforts and traditional fund source requirements. To ascertain the need for rental assistance, to date, there are 4,431 submitted and “pending” applications to CAA, in various states of completeness, from the ADOH online portal. A considerable decrease from 5,300 a month ago and from the original estimate of 7,500 at the onset of the pandemic, which included duplicates and other data anomalies. Of the 4,431 pending applications, staff has actively engaged with nearly 1,300 applicants netting the following results (Attachment-B):

| Households Engaged | Approved | Withdrawn or Denied | Total Budget | Total Expended | Average Assistance |
|--------------------|----------|---------------------|--------------|----------------|--------------------|
| 1,241 | 134 | 318 | \$600,000 | \$189,077.30 | \$778.10 |

What these numbers indicate is at current capacity, existing CAA staff at 10+/- FTE can actively work up to 1,300 households, either telephonically or over email, to directly assist them with completing their pending submitted application. Despite these efforts, however, to date only 11% or 134 County households have been funded per ADOH’s requirements.

This outcome is representative of most rental assistance programs, whereas, significant County time and effort is employed to literally set an appointment; conduct in-person data entry; and case manage families to just complete an application. Regrettably, many are denied per varying income requirements compounded by missing or readily unavailable documentation. In other instances, families qualified, but ultimately decided to utilize their IRS stimulus check or other unconventional resources, e.g. car title loans, to get current. Considering changes to 30- or 40-year old federal grant regulations takes an act of Congress, County CRF and other CARES resources will prove pivotal in fill gaps for COVID-19 impacted households, via attestation or affidavit, that otherwise would not qualify for adequate funding to bring them current, avoiding eviction.

Assessing Need, Eviction Prevention Services

In addition to increasing staffing capacity to address an anticipated increase in COVID-19 related applications for rental assistance, especially in direct response to the extension of the moratorium, there is significant concern on how to best to assist households in eviction. The following staff analysis - which may vary from figures provided by Judge Pesquiera - captures “Eviction Case Judgements” utilizing Pima County Consolidated Justice Court (PCCJC) data. As indicated in *Table 5, Evictions and Estimated*

Judgements, March through June 2020, since the start of the pandemic, over 600 households have been issued evictions with estimated judgments totaling over \$1M during the four (4) month term. Notably the moratorium seems to have had a significant impact on decreasing the number of “eviction judgements” that occurred in April and May. Despite these protections, however; evictions significantly increased nearly 800% from April to June with estimated mean and median judgements also increasing by 62% and 190% respectively. This spike may be indicative of landlords anxious to evict in anticipation of the initial moratorium ending. Nonetheless, with postponement possibility to October 31, 2020 with Executive Order (EO) 2020-49, it will be interesting to see if eviction judgments reduce back April levels, remain consistent with March and June numbers, or increase altogether. Attachment-D, provides a spatial representation of evictions Countywide.

Table 5, Evictions and Estimated Judgements, March through June 2020

| Month | Tucson | S. Tucson | Oro Valley | Marana | Sahaurita | Pima County | All Jurisdictions | Judgements | | |
|--------------|------------|-----------|------------|----------|-----------|-------------|-------------------|-----------------------|----------------------|---------------------|
| | | | | | | | | Average Per Household | Median Per Household | Est. Total by Month |
| Mar-20 | 207 | 5 | 4 | 1 | 1 | 41 | 259 | \$ 1,649 | \$ 1,386 | \$ 427,239 |
| Apr-20 | 22 | 1 | 0 | 0 | 1 | 4 | 28 | \$ 1,252 | \$ 618 | \$ 35,054 |
| May-20 | 48 | 1 | 0 | 0 | 2 | 17 | 68 | \$ 1,411 | \$ 1,030 | \$ 95,942 |
| Jun-20 | 209 | 5 | 1 | 0 | 0 | 32 | 252 | \$ 2,030 | \$ 1,791 | \$ 510,215 |
| Total | 486 | 12 | 5 | 1 | 4 | 94 | 602 | | | \$ 1,068,450 |

Source: *Eviction Case Judgments by Filing Date Spreadsheet, PCCJC*

Staff is involved in weekly Monday discussions with Constables, Justices of the Peace, Judges, local and national legislative staffers and academic legal experts directly working in the eviction arena. When initially reviewing Table 5, this working group was critical that both the number of evictions and judgement costs seeming relatively low; not taking into consideration, “the actual volume of evictions cases that go to hearing.” To date the only reliable data staff has been able to tease out of various sources regarding said evictions hearings is for the first three weeks of June, which totaled 841 cases. A sampling of 47 “Eviction Actions” were reviewed from this separate data with an average and median “final judgement” at \$3,465 and \$3,556 respectively when including all fees and court costs.

As previously mentioned, currently available eviction data is troublesome to define, verify, and ranges widely. Hence, at this time, staff can only report that evictions in Pima County span from 28 to 900 a month with potential judgements ranging from a few hundred dollars to over \$3,500. Obviously, more information and access to consistent data is needed to better project the volume and cost to develop eviction mitigations for the remainder of the fiscal year and beyond. Department staff is ready to work collaboratively with other departments; academic and legal professionals; outside agencies; and the courts as directed in the July 23, 2020, *Coherent Eviction Policy for Pima County* memorandum.

County CARES Implementation Update, Rental Assistance & Eviction Prevention Strategies

The need for rapid deployment of rental assistance and eviction prevention initiatives is the greatest ever seen in modern history. Various national studies indicate that approximately 20% of all renters in the United States will be negatively impacted by a COVID-19 related eviction, over 20M households. Locally, the potentially negative economic impact in terms of lost revenues into the community and increases in homelessness, including families with children, is at upmost concern. If limited to traditional state agency and entitlement resources, potential gains to keep County folks in their homes and local property owners solvent may be stymied in their uncompromising complexity, ill-conducive to the realities of COVID-19.

In order to utilize all existing funding effectively as possible, CRF and other CARES resources will be used strategically to fill upstream (rental assistance) and downstream (eviction preventions and rehousing) gaps quickly and efficiently. Community & Workforce Development (CWD), in direct consultation with GMI, is actively implementing the following strategies this two-pronged approach to increase accesses to rental assistance and eviction prevention resources.

□ Strategy 1: Fully integrate available CARES resources with traditional funds.

As consistently noted throughout this memorandum, access to available CARES resources, most importantly CRF, is critical to the effective implementation of all rental and eviction prevention strategies. Staff is fully aware that CRF is a finite resource with significant and warranted demands on its use, most notably, for public health to combat the pandemic. The proposed \$7,845,993 in CRF, includes \$595,993 to staff up CAA, will be used exclusively to fill funding gaps and timely complete rental assistance applications and directly assist families in eviction, at or below 120% Area Median Income (AMI), that other more restrictive funding sources cannot address.

For example, in order to process an ADOH application, February income per the head of household needs to be submitted to establish a pre-COVID baseline. Proof of income reduction for each subsequent month rental assistance is requested must be submitted via the ADOH portal. CAA staff reviews and calculates what the tenant can afford, then factors the 70% ADOH funds will provide. In most instances, applicants cannot produce all the monthly income documentation for various legitimate reasons frustratingly delaying the completion of the application. In these particular circumstances, at day five (5), CAA staff will look to employ available CARES resources to fill the gaps, i.e. the 30% ADOH does not pay, in addition to, any months missing documentation within reason. CARES funds including LiHEAP and ESG-CV if family is 60% AMI; CSBG if at 125% Federal Poverty Level; CDBG-CV if at 80% AMI; and finally, CRF up to 120% AMI. The application will be completed with landlord/renter settlements/payment plans and respective CARES renter attestation documents upload into the ADOH portal satisfying applicable EO 2020-49 requirements.

□ Strategy 2: Standardized Documents for CARES Rental and Eviction Prevention Assistance

Renter Attestation & CARES Application Form. Unlike traditional funding sources that require extensive application processes, most CARES resources will allow for an attestation or affidavit to be executed by a renter identifying they are impacted by Covid-19. CWD, in cooperation with GMI and the City of Tucson, are finalizing a simple one-page renter attestation document which will be consistent with the eviction postponement eligibility requirements identified EO 2020-49.

Tenant/Landlord Settlement Agreement & Payment Plan. This document is also nearly finalized to satisfy EO 2020-49 mandates. This standard document will be marketed and made readily available to landlords, renters, outside agencies and constables to actively execute with available parties in the field either in hardcopy, fillable PDF or other approved paperless document execution application, e.g. DocuSign. The document will be executed by both the renter and landlord formalizing a settlement plan to pay rent in arrears, applicable courts costs, required waived late fees, etc.

☐ Strategy 3: Rental Assistance, Increase CAA Capacity.

County has committed \$595,993 in CRF resources to immediately hire and provide overtime for 25 additional, temporary Program Specialists to process the increase in ADOH rental assistance applications. In addition to traditional working hours, the new employees will also be scheduled to work nights and weekends as needed to meet demand. Facilities Management and IT are actively working to convert the large conference rooms at the Pima County Housing Center into safe, dual monitor, workspaces for both the new employees and seasoned CAA staff that will provide staff training onsite. Safety measures include, but not limited to, delineated 8-foot work spaces; Plexiglas partitions; a valid request for hands-free telephone headsets and face shields (since they will be primarily on the phone and performing data entry functions at the same time); and finally, increased HVAC cycling.

Interviews are underway and it is anticipated that the new employees will start August 3, 2020. Initially duties will focus solely on working with applicants to complete their ADOH applications with appropriate documentation including executing County attestation forms with renters, in addition to, coordinating with property owners and smaller “mom and pop” landlords to broker tenant/landlord payment plans. Existing CWD Community Services Intake Specialists (CSIS) and knowledge Administrative Support Staff will be assigned as “Team Leads” to effectively provide on the job training for the new employees while also performing administrative, programmatic and fiscal functions including funding each applicant as appropriate with ADOH, CARES and traditional resources as described in Strategy 1.

☐ Strategy 4: Rental Assistance, Pilot a Multi-Family Housing Property Manager Referral Process

Many property management companies have been working with their tenants during the pandemic and not engaging in the eviction process. Like “mom and pop” landlords, they too are also carrying costs typically paid with rents that would otherwise operate and manage their apartment complexes. CWD will create a specialized team from temporary and existing employees to work directly with property management firms to process ADOH applications for their identified renters in arrears. The program will be voluntary with the property managers agreeing to provide marketing materials and instruction to their tenants in advance, directly assisting them with processing their ADOH applications. The property managers will also broker and execute the tenant/landlord agreement and attestation forms. Finally, the properties will also schedule and safely make available clubhouse space and computers to assist renters in finalizing their ADOH applications with CWD staff during either remotely or onsite.

☐ Strategy 5: Eviction Prevention Agency Partnership, Non-Profit Fiscal Agent

Rapidly assemble a specialized collaborative of non-profit partner agencies to work directly with Constables, tenants and landlords currently engaged in the eviction process is paramount. This agency driven strategy replicates the successful and proven model both the City of Tucson and Pima County effectively utilize to administer first-time homebuyer and down-payment assistance; i.e. via a single non-profit, fiscal agent that subcontracts partner agencies. Community Investment Corporation, Inc. (CIC) is that fiscal agent and is the most qualified agency to fulfill a similar role working with local agencies to strategically address evictions in progress. CRF will be the primary funding source for this eviction prevention initiative.

The Eviction Prevention Agency Partnership concept is simple and builds upon assistance strategies used during the foreclosure crisis. All Pima County non-profit agencies actively operating in the eviction and

homeless prevention realm, approximately five to eight in total, will be subcontracted to become partner agencies, under CIC, in what ultimately is a pay per performance model. CIC will staff the “12 day court minutes” and take direct referrals from Constables effectively assigning the next available partner agency to immediately contact the tenant and landlord to execute the Renter Attestation Form, in addition to, the Tenant/Landlord Settlement Plan & Payment Plan to bring the family current and avoid eviction. It may be possible for agencies to attend court hearings as well, with funding “in hand” to be made immediately available to landlords if they agree not to evict should the household become current. Most promising, however, is CIC commitment to embrace technology to create a simple online application to be made directly available to Constables, agencies, renters and landlords to execute documents electronically through a series of qualifying questions that will effectively create both the Attestation Form and Tenant/Landlord Settlement Plan electronically in the field.

Once the standard forms are completed, a Constable or partner agency can submit to CIC online to review and make payment directly to the landlord either electronically or via live check they can pick up. As previously noted, in addition to paying the arrears, it might be in the County’s best interest to contract CIC to fund an additional month in advance under the condition the households applies for other workforce development training and resources. Should the landlord not want to take the payment and move forward with eviction, partner agencies assigned to the household will transition will utilize identified CARES funds for security deposits, first month’s rent, etc. to rapidly rehouse the family in new housing.

CIC will effectively make subcontracts to the partner agencies as administratively reviewed and approved by County, fully incorporating a partner agency scope of work as an attachment in a respective subrecipient contract currently drafted by CWD staff in collaboration with GMI.

□ Strategy 6: Prioritize HUD ESG-CV II funds to assist “Newly Homeless”

Currently, HUD ESG funds are prioritized to address individuals experiencing chronic homelessness, i.e. folks living on the street. Considering the sheer volume of applications for rental assistance and the foreseeable demand for eviction prevention resources, staff recommends allocating CARES funding to assist first-time households that will inevitably become homeless due to eviction or other COVID-19 housing loss related impact. ESG-CV II and CRF funds are most appropriate to rapidly rehouse these families possibly via CAA and the Eviction Prevention Agency Partnership. Collaborative efforts with the local Tucson Planning Council for the Homeless (TPCH) are currently underway as they relate to specific ESG and Continuum of Care requirements, notably Coordinated Entry which County and City of Tucson should jointly pursue a waiver from HUD.

□ Conclusion

The current demand for rental assistance and eviction prevention resources for families directly impacted by Covid-19 is unprecedented. Over the last couple months, significant staff time and effort has been employed to research, vet and develop these rental assistance and eviction prevention strategies directly taking into consideration national best practices and implementation models. CARES funds, most importantly CRF resources, are fundamental in the execution of these strategies.

Attachments (4)

c: Jan Leshar, Chief Deputy County Administrator
Regina Kelly, Director, Grants Management & Innovation

ATTACHMENT-A

| Available and Pending Grant Resources Beginning 7/1/2020 | Funding | Expensed as of 7/21/20 | Grant Requirements | | | Rent Assistance & Eviction Prevention | | | | | | | | Post Eviction (Rapid Rehousing) | | | | | | |
|---|----------------------|------------------------|----------------------|-----------------|--------------|---------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| | | | Income Qualification | Max. Assistance | Max. Funding | Application Processing | Case Management | Past Due Rent | Late Fees | Legal Fees | Current Month Rent | Future Month Rent | Utility Assistance | Prior Judgments | Case Management | App/Application Fees | Security Deposit | First Month Rent | Moving Costs | Furnishings |
| Federal | | | | | | | | | | | | | | | | | | | | |
| Coronavirus Relief Fund (CRF), CAA Rental Assistance (*) (includes 25 additional PCN) | \$ 4,220,993 | \$ 15,988 | Attestation | None | None | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| CRF, Agency Eviction Prevention Partnership (*) | \$ 3,625,000 | \$ - | Attestation | None | None | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| HUD Community Development Block Grant-CV (CDBG-CV), CAA Rent Assistance Program | \$ 500,000 | \$ - | 80% AMI | 3 mos. | None | | | <input checked="" type="checkbox"/> | | | | | | | |
| HUD, Emergency Solutions Grant-CV II (ESG CARE II), CAA Rental Assistance (*) | \$ 1,000,000 | \$ - | 60% AMI | 5 mos. | None | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| HUD, ESG CARE II, Agency Eviction Prevention Partnership (*) | \$ 1,000,000 | \$ - | 60% AMI | 6 mos. | None | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| HUD, ESG PY 20 Entitlement | \$ 15,125 | \$ - | 60% AMI | 6 mos. | None | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| HUD, ESG PY 19 Entitlement | \$ 37,000 | \$ - | 60% AMI | 6 mos. | None | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| HUD HOME Tenant Based Rental Assistance (TBRA) Pilot | \$ 195,000 | \$ - | 80% AMI | 24 mos. | None | <input checked="" type="checkbox"/> | | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | | | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| FEMA, Emergency Food & Shelter Program (EFSP) CARES | \$ 164,156 | \$ - | 200% FPL | 1 mo. | None | | | <input checked="" type="checkbox"/> | | <input checked="" type="checkbox"/> | | | | | | | | | | |
| FEMA, EFSP Phase 37 | \$ 67,440 | \$ - | 200% FPL | 1 mo. | None | | | <input checked="" type="checkbox"/> | | <input checked="" type="checkbox"/> | | | | | | | | | | |
| Health & Human Services (HHS), Low Income Home Energy Assistance Program (LIHEAP-CARES) | \$ 2,164,722 | \$ - | 60% AMI | Once/yr | \$1,800 | <input checked="" type="checkbox"/> | | | | | | <input checked="" type="checkbox"/> | | | | | | | | |
| HHS, Community Services Block Grant (CSBG-CARES) | \$ 1,188,464 | \$ - | 125% FPL | Once/yr | \$1,000 | <input checked="" type="checkbox"/> | | <input checked="" type="checkbox"/> | | <input checked="" type="checkbox"/> | | | | | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| HHS, Community Services Block Grant (CSBG) | \$ 815,464 | \$ - | 125% FPL | Once/yr | \$1,000 | <input checked="" type="checkbox"/> | | <input checked="" type="checkbox"/> | | <input checked="" type="checkbox"/> | | | | | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| HHS, Low Income Home Energy Assistance Program (LIHEAP) | \$ 3,610,959 | \$ - | 60% SMI | Once/yr | \$1,800 | <input checked="" type="checkbox"/> | | <input checked="" type="checkbox"/> | | <input checked="" type="checkbox"/> | | | | | | | | | | |
| HHS, Temporary Assistance for Needy Families/Short Term Crisis Services (TANF/STCS) | \$ 540,565 | \$ - | 125% FPL | Once/yr | \$2,300 | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| HHS, Neighbors Helping Neighbors | \$ 6,210 | \$ - | 125% FPL | Once/yr | \$1,800 | | | | | | | <input checked="" type="checkbox"/> | | | | | | | | |
| State | | | | | | | | | | | | | | | | | | | | |
| Arizona Department of Housing (ADOH) COVID-19 Eviction Prevention & Rental Assistance (*) | \$ 600,000 | \$ 189,077 | 100% AMI | 2 mos. | \$2,000 | | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | <input checked="" type="checkbox"/> | | | | | | | | | |
| ADOH, Eviction Prevention Pilot (*) | \$ 280,000 | \$ 280,623 | 60% AMI | Once/yr | \$1,500 | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | <input checked="" type="checkbox"/> | | | | | | | | | |
| Arizona DES Housing Support through SJEC | \$ 40,000 | \$ - | 30% AMI | Once/yr | \$4,000 | | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | <input checked="" type="checkbox"/> | | | | | <input checked="" type="checkbox"/> | | | | |
| Arizona Community Action Association | | | | | | | | | | | | | | | | | | | | |
| Wildfire, Tucson Electric Power | \$ 92,000 | \$ 33,918 | 150% FPL | Once/yr | \$500 | | | | | | | <input checked="" type="checkbox"/> | | | | | | | | |
| Wildfire, SWG Low Income Energy Conservations (LIEC) | \$ 47,890 | \$ 47,890 | 200% FPL | Once/yr | \$400 | | | | | | | <input checked="" type="checkbox"/> | | | | | | | | |
| Wildfire, SWG Energy Share (ES) | \$ 36,120 | \$ 31,622 | 200% FPL | Once/yr | \$400 | | | | | | | <input checked="" type="checkbox"/> | | | | | | | | |
| Wildfire, TRICO | \$ 105,497 | \$ 27,295 | 200% FPL | Once/yr | \$800 | | | | | | | <input checked="" type="checkbox"/> | | | | | | | | |
| Wildfire, Utility Repair Replace & Deposit (URRD) | \$ 69,800 | \$ 98,208 | 200% FPL | Once/yr | \$3,000 | <input checked="" type="checkbox"/> | | | | | | <input checked="" type="checkbox"/> | | | | | | | | |
| Local | | | | | | | | | | | | | | | | | | | | |
| Emergency Eviction Intervention Prevention (*) Pima County General Fund | \$ 101,000 | \$ - | 125% FPL | Once/yr | \$1,000 | | | <input checked="" type="checkbox"/> | | <input checked="" type="checkbox"/> | | | | | | | | | | |
| Totals | \$ 20,523,405 | \$ 724,621 | | | | | | | | | | | | | | | | | | |

Income Limits per Various Funding Sources

| Pima County Family of Four | 30% | 60% | 80% | 100% | 120% | 125% | 150% | 200% |
|-----------------------------|----------|----------|----------|--------|----------|----------|----------|----------|
| Area Median Income (AMI) | \$26,200 | \$34,200 | \$54,700 | 68,400 | \$82,080 | | | |
| Federal Poverty Level (FPL) | | | | | \$32,748 | \$39,300 | \$52,405 | \$52,405 |

COVID-19 Rental Assistance Program

27-Jul-20

| COMMUNITY ACTION AGENCY | IN REVIEW | REQUESTED | TOTAL HOUSEHOLDS | TOTAL MONTHS OF ASSISTANCE | TOTAL ASSISTANCE | AVERAGE ASSISTANCE |
|--|--------------|------------------------|------------------|----------------------------|-----------------------|--------------------|
| City of Phoenix Human Services | 2,655 | \$ 2,986,839.48 | 325 | 529 | \$498,087.35 | \$941.56 |
| Coconino County Community Services | 65 | \$ 79,985.88 | 153 | 169 | \$150,993.10 | \$893.45 |
| Community Action Human Resource Agency | 161 | \$ 207,336.60 | 86 | 153 | \$123,301.84 | \$805.89 |
| Gila County Community Action Program | 2 | \$ 2,000.00 | 10 | 14 | \$12,472.38 | \$890.88 |
| Glendale Community Action Program | 495 | \$ 582,000.00 | 56 | 91 | \$84,762.36 | \$931.45 |
| Maricopa County Human Services | 3,332 | \$ 3,760,427.49 | 256 | 294 | \$308,417.47 | \$1,049.04 |
| Mesa Community Action Network, A New Leaf | 736 | \$ 833,135.01 | 96 | 99 | \$119,029.20 | \$1,202.32 |
| Northern Arizona Council of Governments | 122 | \$ 144,362.00 | 64 | 83 | \$69,060.46 | \$832.05 |
| Pima County Community Service Department | 1,241 | \$ 1,315,625.58 | 134 | 243 | \$189,077.30 | \$778.10 |
| South Eastern Arizona Community Action Program | 17 | \$ 17,426.91 | 21 | 30 | \$17,110.66 | \$570.36 |
| Western Arizona Council of Governments | 41 | \$ 47,328.74 | 111 | 204 | \$143,701.29 | \$704.42 |
| TOTALS | 8,867 | \$ 9,976,467.69 | 1,312 | 1,909 | \$1,716,013.41 | \$898.91 |

| | | |
|------------------------------|--------------|-----------|
| % SUBMITTED IN REVIEW | 8,867 | 46 |
|------------------------------|--------------|-----------|

| DECISIONED SUMMARY: | | % OF ALL APPLICATIONS | % OF DECISIONED |
|--------------------------|---------------|-----------------------|-----------------|
| APPROVED HOUSEHOLDS | 1,312 | 7 | 12 |
| INELIGIBLE | 636 | 3 | 6 |
| INCOMPLETE | 7,633 | 39 | 72 |
| WITHDRAWN | 1,014 | 5 | 10 |
| TOTAL DECISIONED: | 10,595 | 54 | 100 |

| | | |
|----------------------------------|---------------|------------|
| TOTAL SUBMITTED REQUESTS: | 19,462 | 100 |
|----------------------------------|---------------|------------|

ATTACHMENT-C, Income Verification Example

SFY 2021 DES/DAAS Community Action Programs and Services **Chart revised May 14,2020**

Attachment SFY 21 K1.A2

Income Limits, Energy Points and Poverty Interval Reporting Factors

Effective July 1, 2020 through June 30, 2021 - ALL CSBG FUNDED SERVICES INCOME LIMIT 200% OF FPL

| 30-DAY INCOME LIMITS FOR COMMUNITY ACTION PROGRAMS | | | | | |
|--|--|--|--|-----------------------------------|--------------------------------|
| HH# | LIHEAP | TANF | TANF With Vulnerable | NHN | CSBG |
| # of household members | LIHEAP - All households (greater of 60% SMI or 150% FPL) | STCS/TANF 125% of FPL without vulnerable | STCS/TANF 150% FPL For vulnerable: seniors, disabled or child 6 and under* | NHN - 125% of FPL: All households | 200% of poverty All households |
| 1 | \$2,061 | \$1,329 | \$1,595 | \$1,329 | \$2,127 |
| 2 | \$2,695 | \$1,796 | \$2,155 | \$1,796 | \$2,873 |
| 3 | \$3,329 | \$2,263 | \$2,715 | \$2,263 | \$3,620 |
| 4 | \$3,964 | \$2,729 | \$3,275 | \$2,729 | \$4,367 |
| 5 | \$4,558 | \$3,196 | \$3,835 | \$3,196 | \$5,113 |
| 6 | \$5,232 | \$3,663 | \$4,395 | \$3,663 | \$5,860 |
| 7 | \$5,351 | \$4,129 | \$4,955 | \$4,129 | \$6,607 |
| 8 | \$5,515 | \$4,596 | \$5,515 | \$4,596 | \$7,353 |
| 9 | \$6,075 | \$5,063 | \$6,075 | \$5,063 | \$8,100 |
| 10 | \$6,635 | \$5,529 | \$6,635 | \$5,529 | \$8,847 |
| 11 | \$7,195 | \$5,996 | \$7,195 | \$5,996 | \$9,593 |
| 12 | \$7,755 | \$6,463 | \$7,755 | \$6,463 | \$10,340 |
| 13 | \$8,315 | \$6,929 | \$8,315 | \$6,929 | \$11,087 |
| 14 | \$8,875 | \$7,396 | \$8,875 | \$7,396 | \$11,833 |
| 15 | \$9,435 | \$7,863 | \$9,435 | \$7,863 | \$12,580 |
| 16 | \$9,995 | \$8,329 | \$9,995 | \$8,329 | \$13,327 |
| 17 | \$10,555 | \$8,796 | \$10,555 | \$8,796 | \$14,073 |
| FOR EACH ADDL OVER 17 | EACH ADDL \$560 | EACH ADDL \$466 | EACH ADDL \$560 | EACH ADDL \$466 | EACH ADDL \$746 |

| LIHEAP ENERGY POINTS FOR INCOME | | | |
|--|--|--|---|
| A | B | C | D |
| (5) Energy points if at or under (25% of income limit) | (4) Energy points if greater than (A) and less than or = (B) (50% of income limit) | (3) Energy points if greater than (B) and less than or = (C) (75% of income limit) | (2) Energy points if greater than (C) and less than or = (D) (100% of the income limit) |
| \$515 | \$1,031 | \$1,546 | \$2,061 |
| \$674 | \$1,348 | \$2,021 | \$2,695 |
| \$832 | \$1,665 | \$2,497 | \$3,329 |
| \$991 | \$1,982 | \$2,973 | \$3,964 |
| \$1,140 | \$2,279 | \$3,419 | \$4,558 |
| \$1,308 | \$2,616 | \$3,924 | \$5,232 |
| \$1,338 | \$2,676 | \$4,013 | \$5,351 |
| \$1,379 | \$2,758 | \$4,136 | \$5,515 |
| \$1,519 | \$3,038 | \$4,556 | \$6,075 |
| \$1,659 | \$3,318 | \$4,976 | \$6,635 |
| \$1,799 | \$3,598 | \$5,396 | \$7,195 |
| \$1,939 | \$3,878 | \$5,816 | \$7,755 |
| \$2,079 | \$4,158 | \$6,236 | \$8,315 |
| \$2,219 | \$4,438 | \$6,656 | \$8,875 |
| \$2,359 | \$4,718 | \$7,076 | \$9,435 |
| \$2,499 | \$4,998 | \$7,496 | \$9,995 |
| \$2,639 | \$5,278 | \$7,916 | \$10,555 |
| EACH ADDL | EACH ADDL | EACH ADDL | EACH ADDL |
| \$140 | \$280 | \$420 | \$560 |

| REFERENCE - POVERTY INTERVAL SCALES FOR REPORTING HOUSEHOLD POVERTY LEVELS - VARIOUS PROGRAMS | | | | | |
|---|---|---|--|---|--|
| A | B | C | D | E | F |
| 0-25% of POVERTY | 26-50% of Poverty - Greater than (A) & less than or = (B) | 51-75% of Poverty - Greater than (B) & less than or = (C) | 76-100% of Poverty - Greater than (C), & less than or = to (D) | 101-125% of Poverty - Greater than (D), & less than or = to (E) | 126-150% of Poverty - Greater than (E) & less than Or = To (F) |
| \$266 | \$532 | \$798 | \$1,063 | \$1,329 | \$1,595 |
| \$359 | \$718 | \$1,078 | \$1,437 | \$1,796 | \$2,155 |
| \$453 | \$905 | \$1,358 | \$1,810 | \$2,263 | \$2,715 |
| \$546 | \$1,092 | \$1,638 | \$2,183 | \$2,729 | \$3,275 |
| \$639 | \$1,278 | \$1,918 | \$2,557 | \$3,196 | \$3,835 |
| \$733 | \$1,465 | \$2,198 | \$2,930 | \$3,663 | \$4,395 |
| \$826 | \$1,652 | \$2,478 | \$3,303 | \$4,129 | \$4,955 |
| \$919 | \$1,838 | \$2,758 | \$3,677 | \$4,596 | \$5,515 |
| \$1,013 | \$2,025 | \$3,038 | \$4,050 | \$5,063 | \$6,075 |
| \$1,106 | \$2,212 | \$3,318 | \$4,423 | \$5,529 | \$6,635 |
| \$1,199 | \$2,398 | \$3,598 | \$4,797 | \$5,996 | \$7,195 |
| \$1,293 | \$2,585 | \$3,878 | \$5,170 | \$6,463 | \$7,755 |
| \$1,386 | \$2,772 | \$4,158 | \$5,543 | \$6,929 | \$8,315 |
| \$1,479 | \$2,958 | \$4,438 | \$5,917 | \$7,396 | \$8,875 |
| \$1,573 | \$3,145 | \$4,718 | \$6,290 | \$7,863 | \$9,435 |
| \$1,666 | \$3,332 | \$4,998 | \$6,663 | \$8,329 | \$9,995 |
| \$1,759 | \$3,518 | \$5,278 | \$7,037 | \$8,796 | \$10,555 |
| EACH ADDL | EACH ADDL | EACH ADDL | EACH ADDL | EACH ADDL | EACH ADDL |
| \$93 | \$187 | \$280 | \$373 | \$466 | \$560 |

* NOTE: In SFY 2021, LIHEAP households larger in size than 7 members will qualify at or under 150 percent of the FPL

