
**RAPID RE-HOUSING AND PREVENTION
POLICY AND PROCEDURES**

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Purpose

The purpose of this document is to create rapid re-housing and prevention policies and procedures. Additionally, the document establishes ESG and homelessness prevention written standards as required by HUD and DCF. A matrix mapping written standards requirement to the implementing section of this document is at appendix A.

Based on national research and established best practices, the Lakeland, Winter Haven/Polk County Continuum of Care (CoC) has implemented homelessness prevention and rapid re-housing short-term rental assistance for homeless families in Polk County. Rapid re-housing is a set of strategies that permanently houses individuals and families as quickly as possible where level and duration of support is tailored to meet the needs of each household. Each household has a lease in their name and is connected to mainstream self-sufficiency services in the community. Providers are expected to remain engaged with the households from first contact to program exit, using a progressive engagement approach and tailoring services to the needs of the household in order to assist the household to maintain permanent housing. Prevention is an approach that focuses on preventing homelessness by providing assistance to households that otherwise would become homeless and end up in a shelter or on the streets.

Definitions

At imminent risk of homelessness: Individual or family who will imminently lose their primary nighttime residence, provided that:

- Residence will be lost within 14 days of the date of application for homeless assistance;
- No subsequent residence has been identified; and
- The individual or family lacks the resources or support networks needed to obtain other permanent housing.

(HUD Definition, Category 2)

At risk of homelessness: (1) An individual or family who:

- (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;
- (ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and
- (iii) Meets one of the following conditions:
 - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days of the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons, or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

(2) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

(3) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

Coordinated Entry

The coordinated process to facilitate program participant intake, assessment, and provision of referrals. The coordinated entry system covers all of Polk County, is easily accessed by individuals and families seeking housing, is well advertised, and includes a comprehensive and standardized assessment tool.

Fair Market Rents (FMRs)

FMRs are used to determine payment standard amounts for rent ceilings for rental units in the Emergency Solution Grants program, the calculation of maximum award amounts for Continuum of Care recipients, and the maximum amount of rent a recipient may pay for property leased with Continuum of Care funds. The U.S. Department of Housing and Urban Development (HUD) annually estimates FMRs for 530 metropolitan areas and 2,045 nonmetropolitan county FMR areas. By law the final FMRs for use in any fiscal year must be published and available for use at the start of that fiscal year (October 1).

Fleeing/Attempting to Flee DV:

Any individual or family who:

- Is fleeing, or attempting to flee, domestic violence;
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing.

(Hud Definition, Category 4)

Homeless:

Homeless means:

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - (i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
 - (ii) An individual or family living in a supervised publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low income individuals); or
 - (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
- (2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or childhood abuse (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention

for criminal activity, and a history of unstable employment; or

(4) Any individual or family who:

(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;

(ii) Has no other residence; and

(iii) Lacks the resources or support networks, e.g., family, friends, and faith based or other social networks, to obtain other permanent housing.

Housing-Focused Case Management

Housing-focused case management focuses on immediate efforts to attain housing, using the minimum assistance needed to address each household's immediate housing crisis. Staff works with each household to identify and refer households to other resources in the community (e.g., mainstream services, benefit services, food assistance programs, childcare resources, etc.) to support ongoing housing stability. Supportive services are voluntary, housing-focused, person-centered and are provided at the level needed by each household.

Literally Homeless:

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Has a primary nighttime residence that is a public or private place not meant for human habitation;
- Is living in a publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
- Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

(HUD Definition, Category 1)

Prevention:

An approach that focuses on preventing homelessness by providing assistance to households that otherwise would become homeless and end up in a shelter or on the streets.

Progressive Engagement: An approach to engagement in which programs provide minimal amounts of assistance to all households initially and then extend or intensify the assistance provided as needed based on an ongoing assessment of household needs.

Rapid Re-housing: An approach that focuses on moving homeless individuals and families into appropriate housing as quickly as possible by providing the type, amount and duration of housing assistance needed to stabilize the household. Resources and services provided are tailored to the needs of the client. Clients do not need to be considered “Housing Ready”. Core components of rapid rehousing are:

- Housing Identification;
- Rent and Financial Move-In Assistance; and
- Case Management and Services.

Acronyms

CoC	Continuum of Care
DV	Domestic Violence
ESG	Emergency Solutions Grant
HUD	U.S. Department of Housing and Urban Development
TANF	Temporary Assistance for Needy Families
RRH	Rapid Rehousing
VI-SPDAT	Vulnerability Index & Service Prioritization Assistance Tool

Referral Process and Household Eligibility

1. Referral Process

All individuals and families will only be assessed for any rapid re-housing or prevention program through a coordinated entry center.

2. Coordinated Entry

All households being referred for rapid re-housing or prevention assistance must be assessed through a Polk County Coordinated Entry System location which includes completing the Vulnerability Index & Service Prioritization Assistance Tool (VI-SPDAT) and following the Coordinated Entry Policies and Procedures. While they may be identified through other sources such as shelter or transitional housing providers, Homeless Education Advocates Restoring the Hope (HEARTH) Liaison in Polk County Public Schools, or other service providers, they will still require screening and assessment through Polk County’s Coordinated Entry system.

3. Documentation

Coordinated entry process gathers Universal Data Elements and the VI-SPDAT as outlined in the Coordinated Entry Policy and Procedures. Providers receiving referrals from coordinated entry are responsible for confirming the household's homeless status, collecting any other information the provider needs, and maintaining hard copies of the records.

4. Homeless Management Information System (HMIS)

All rapid re-housing and prevention client data, except domestic violence clients, must be entered into HMIS.

5. Eligibility

Clients meeting the literally homeless criteria (HUD Definition, Category 1) or the fleeing/attempting to flee DV criteria (HUD Definition, Category 4) may be assessed for CoC and ESG Rapid Rehousing. Clients who meet the at risk of homelessness criteria, but do not meet the literally homeless criteria or at imminent risk of homelessness criteria may be assessed for prevention. Client eligibility must be documented.

6. Mainstream Resources

All rapid re-housing and prevention clients will be screened to determine whether assistance with obtaining mainstream resources is needed and if so, assistance must be provided.

General Operating Standards

1. Progressive Engagement

Providers will determine the amount of rent and utility assistance and/or supportive services households will receive using the progressive engagement approach. The provider working with the household will identify the minimum amount and duration of assistance needed to achieve housing stability. Unless the requested amount exceeds funder set limits, the provider should begin with the amount identified by the household. If it becomes clear after 90 days that the amount and/or duration are not enough, the household will be reassessed, and the amount and duration of assistance may be adjusted. If it becomes clear that a rapid re-housing intervention is insufficient and or inappropriate for a particular household, the provider will work with coordinated entry and/or other housing providers to find a more suitable program.

2. Case Management

All rapid rehousing clients will receive case management in accordance with Section 8, Core Components of Rapid Rehousing. This is a requirement for all funding sources.

3. Lapsed Time to Re-Housing Target

Households should be housed within 30 days of acceptance into the program.

4. Lease Terms

Participants must enter into an initial lease with the landlord of at least one year which is terminable for cause. The leases must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party. The lease must comply with fair housing regulations.

5. Before Commitments Are Made

5-1. Housing Quality Standards

Housing for which rapid re-housing funds are provided must meet HUD housing quality standards (HQS) under 24 CFR 982.401(j). Before any assistance is provided on behalf of a program participant, the agency must conduct an HQS Inspection. Assistance will not be provided for units that fail to meet HQS, unless the owner corrects any deficiencies within 30 days from the date of the initial inspection and the inspector verifies that all deficiencies have been corrected.

5-2. Lead Based Paint

Units to be occupied by households with child(ren) age 6 or under meet the HQS lead based paint requirements.

5-3. Suitable Dwelling Size

The dwelling unit must have at least one bedroom or living/sleeping room for each two persons.

- Children of the opposite sex, other than very young children, may not be required to occupy the same bedroom or living/sleeping room.
- If household composition changes during the term of assistance, providers may relocate the household to a more appropriately sized unit. The household must still have access to appropriate supportive services.
- Reasonable exceptions can be made, based on professional judgment, in cases where large families will not be able to afford such a large unit after the assistance ends.

5-4. Rent Reasonableness

Before a lease can be signed the provider must determine that the rent amount is “reasonable rent” and the determination that the rent is “reasonable” must be documented in the file. Guidance on determining rent reasonableness is available on the HCPC website. The requirement for rent limits are not the same between CoC Rapid Rehousing and ESG Rapid Rehousing. CoC uses rent reasonableness while ESG uses the lesser of Fair Market Rents (FMRs) or rent reasonableness. RRH projects funded by other sources may determine their own rent limits or use HUD standards

5-5. Education

The agency administering the rapid rehousing grant should:

- Ensure that program participant understands their lease and their responsibilities; and
- Ensure that the landlord understands the commitments being made.

6. Financial Assistance

The type and extent of financial assistance is determined by the funder of a rapid re-housing program and can vary from funder to funder. The funder requirements must be followed and documented.

6-1. ESG Rapid Rehousing Financial Assistance

The following types of financial assistance are authorized for ESG Rapid Rehousing:

- Rental application fees (must be reasonable and usual);
- Security deposits (up to 2 months; no more than \$3,000);
- Last month's rent (no more than \$1,500);
- Utility deposits and payments (no more than \$350);
- Utility payments (no more than \$2,400);
- Moving costs (no more than \$500);
- Rental assistance either project-based or tenant-based;
- Any combination of the above types, so long as the total amount of assistance does not exceed 24 months; and
- Clients may receive assistance no more than once in a three-year period.

6-2. ESG Homelessness Prevention Financial Assistance

The types of financial assistance allowed are the same as ESG rapid rehousing financial assistance; however, the costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in their current housing or move into other permanent housing and achieve stability in that housing.

6-3. CoC Financial Assistance

The following types of financial assistance are authorized for CoC Rapid Rehousing:

- Security deposit—not to exceed two months of rent;
- Advance payment of last month's rent may be paid up front, in addition to security deposit and first month rent;
- Short-term or medium-term rental assistance, limited to "reasonable rent";
- A maximum of 24 months of rent assistance, however, using progressive engagement it most likely will be much shorter;
- Must be tenant-based rental assistance, not project-based; and
- No payment of rent or utilities in arrears.

6-4. TANF Homelessness Prevention Financial Assistance

- Past due rent or mortgage payments, not to exceed four (4) months of rent or mortgage payment and not to exceed \$2,500 per person;
- Past due utility bills, not to exceed four (4) months in arrears for electric, gas, water and sewer only and not to exceed \$500;
- Clients may receive assistance no more than once in a three-year period.

7. Supportive Services

7-1. ESG Rapid Rehousing Allowable Services

Only the following services are allowable to ESG Rapid Rehousing:

- Housing search and placement;
- Housing stability case management;
- Mediation;
- Legal services; and
- Credit repair.

Funds in this category will be used primarily for case management. These services can be provided for a maximum of 24 months.

7-2 ESG Homelessness Prevention Allowable Services

ESG homelessness prevention allowable services are the same as ESG Rapid rehousing allowable services; however, the costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in their current housing or move into other permanent housing and achieve stability in that housing.

7-3. CoC Rapid Rehousing Allowable Services

CoC Rapid Rehousing allowable services are more extensive than ESG Rapid Rehousing allowable services. They include:

- Case management;
- Child care;
- Education services;
- Employment assistance and job training;
- Food;
- Housing search and counseling services, including mediation, credit repair, and payment of rental application fee;
- Legal services;
- Life skills training;
- Mental health services;
- Moving costs;
- Outpatient health services;
- Outreach services;
- Substance abuse treatment services;
- Transportation; and
- Utility deposits

7-4. TANF Homeless Prevention Allowable Service

Case management is the only service allowable in a TANF grant.

8. Core Components of Rapid Rehousing

8.1. Housing Identification

Housing Identification is the first core component of RRH. The goal of housing identification is to quickly locate affordable housing options for the household experiencing homelessness. There are two activities under this core component:

Housing Option Recruitment and Support

- Recruitment of landlords, homeowners, or renters with units, rooms or housing options;
- Negotiation with landlords or homeowners to facilitate household access, including households with rental barriers;
- Attentiveness to landlords in order to preserve and develop partnerships for current and future housing placements; and
- Administration of landlord or homeowner incentives and help recuperate losses.

Household Housing Search and Support

- Assessment of tenant needs and barriers to housing placement;
- Setting family or individual expectations on location, size and/or rent;
- Conducting a targeted housing search with housing affordability plan;
- Supporting households with completing rental applications;
- Providing tenant counseling (including education on how to speak with landlords, understanding rental applications and leases, securing utilities, and understanding tenant obligations); and
- Supporting households with setting up utilities and making moving arrangements.
- When a family or individual identifies a housing option, case managers must conduct a housing inspection prior to move-in and financial assistance. Refer to section 5.1 Housing Quality Standards.

8.2. Housing-Based Case Management

Case management and services are the second core component of RRH. The goals of RRH case management are to help households obtain and move into permanent housing, to support households to stabilize in housing, and to connect them to community and mainstream services and supports if needed. Before services begin, case managers will explain the scope of RRH, including the role of case management in order to set expectations.

Housing Stability Plan

Case managers are required to work with each household to develop a housing stability plan. A housing stability plan is an individualized housing and service plan that is housing-focused and client-driven. Housing stability plans are individualized based on housing needs as identified by each household and are used to facilitate housing-focused case management with the goal of obtaining or maintaining housing stability. Engage-

ment in services should be voluntary and build on the strengths and resources of each household.

Housing Stability Plans should include:

- outline of goals pertaining to housing, including moving into housing and maintaining housing;
- outline roles and expectation of household;
- outline roles and expectation of case manager; and
- timelines for each step.

Case managers are encouraged to review the Housing Stability Plan with each household on a regular basis to assess progress. This tool may be used for progressive engagement to determine if additional supports are needed to attain the housing goals. A Model Housing Stability Plan is at attachment B.

No Contact Procedures

Case managers will check-in with the household at least once a month while enrolled in the program. No matter which stage the household is in the program, it is always the responsibility of the case manager to stay in contact with the household. All possible ways or methods to contacting the household must be explored. A final attempt to contact must be in writing, allowing five days to respond.

If there is no contact after 30 days of multiple attempts to reach the household, the case manager should exit the household from the program. If the household calls after that period and is still experiencing homelessness, the case manager may help them reconnect with Coordinated Entry.

If the case manager has not been able to have a robust check-in with the household for more than 30 days but has had contact with the household and they are still in need of services, the case manager should continue to work with the household on their housing goals. If a household still needs and wants services, but missed appointments or communication is not regular, the case manager should initiate a discussion to reset the program expectations by reviewing housing stability plan and the expectations for re-assessment.

The goal is to minimize or eliminate any exits for “non-compliance” or “lack of participation” especially if the homeless situation has not yet been resolved. Instead, the goal is to be clear about the scope of RRH and to determine if it will meet the needs of the household, then continue to work with the household until they are permanently housed or otherwise resolve the housing crisis. At a minimum, program participants must attend monthly case management meetings. This is required in Rapid Rehousing and Housing Prevention.

8.3. Financial Assistance

Financial assistance is the third core component of RRH. Financial assistance in RRH provides short-term support to households so they can quickly obtain housing. Financial assistance is based on the progressive engagement principle of offering the minimum amount of assistance necessary for households to move out of homelessness and stabi-

lize in permanent housing. The role of the case manager is to prepare households for the end of the financial assistance by leveraging resources or working with the household to increase household income. Programs should begin by assuming that households, even those with zero income or other barriers, will succeed with a minimal subsidy and support rather than a long subsidy, and extend services and support if necessary.

Income Determination

24 CFR 5.609 defines Annual Income and establishes the kinds of income included in calculating Annual Income. 24 CFR 5.611 defines Adjusted Income and establishes the deductions and exclusion from Annual Income in calculating Adjusted Income.

Annual Income and Adjusted Income calculations are required to determine the maximum rent contribution of households receiving rental assistance. The household's maximum rent contribution is 30% of their monthly adjusted household income (Adjusted Income divided by 12) or 10% of the household's monthly gross income (Annual Income divided by 12), whichever is greater. The program pays for the remaining portion.

24 CFR 5.609 and 24 CFR 5.611 are at attachment C and D. The HUD Resident Rent Calculation Worksheet in Microsoft Word format is at attachment E. It is available as an Excel worksheet on the HCPC website, www.polkhomeless.com. Select the Coalition Documents tab then select the Policies and Procedures link. The worksheet is included in Rapid Rehousing Documents. A hot link to the Lakeland Housing Authority Utility Allowance documents is also included in Rapid Rehousing Documents. These allowance schedules are used in calculating rental assistance when utilities are not included in the rent. CPD-17-11, Subject: Determining a Program Participant's Rent Contribution, Occupancy Charge or Utility Reimbursement in the Continuum or Care (CoC) Program when the Program Participant is Responsible for the Utilities, is also included in Rapid Rehousing Documents.

Rental Financial Assistance

Service providers shall apply the following rental assistance calculation to determine the rent subsidy amount for each household. Any exceptions to this model are to be handled as described under Assessment and Re-Assessment or by checking with the funder.

- 1st month: Program pays up to 100% of move in costs including first and last month's rent and any utility and security deposits.
- 2nd month through 12th month: Household pay 30% of their monthly adjusted household income or 10% of the household's monthly gross income, whichever is greater, towards rent. The program pays for the remaining portion.

Communications with Landlords

To help landlords understand the program and to set expectations, providers should send a letter or document to the landlord outlining the details of the program. A model of a Landlord Expectation Letter is at attachment F.

Assessment and Re-Assessment of Housing Needs

Each household's needs must be re-assessed regularly to establish continued program eligibility and to determine the amount of continued financial assistance. Re-assessment must be completed at least every three months.

If a household is not housed before the first re-assessment, the case manager and household will review the household's housing stability plan to address any barriers to achieving housing stability goals. If progress is not occurring, the case manager should initiate a conversation around expectations and limitations of the RRH program.

Once housed, the re-assessment must include at least the following components:

- length of rental financial assistance period to date;
- documentation of household income as a percentage of Area Median Income (AMI);
- percent of income being paid toward rent ratio;
- progress on housing stability and income goals;
- any recent changes in circumstance that will impact income or ability to work; and
- any gaps in resources or support networks inhibiting the household's ability to retain housing while paying 60% of income towards rent without financial assistance.

Rental Assistance over 12 Months

The goal rapid rehousing is to prepare households for the end of the financial assistance within 12 months of entry in the program by leveraging resources or working with the household to increase household income. When households require rental financial assistance exceeding 12 months, they may receive rental assistance for up to 24 months for CoC and ESG rapid rehousing programs. Other funders may have different maximum months for rental assistance. Providers receiving RRH funding from sources other than HUD should check with their funder to determine the maximum length of time rental assistance can be provided. In any case rental assistance should be provided only as long as needed to successfully exit the program.

Ending Financial Assistance

Providers may cease providing financial assistance for the following reasons:

- the household is no longer in need of or interested in receiving services;
- the household is able to pay 60% or less of their gross income toward rent;
- there is no (zero) communication in at least 30 days from the household after multiple provider attempts to contact.

9. Combining Households

On a case by case basis, an eligible household may identify and combine with another household, at entry or mid-program provided that:

- a. The eligible family will be added to the lease in cases where the receiving household is a leaseholder; or, in cases where the receiving household is a homeowner, the eligible household will have their own lease with the homeowner; and
- b. The living situation does not jeopardize either family's safety or ability to comply with lease requirements; and
- c. The combined income of both or all households does not exceed the limits set forth by the funder.

10. Ongoing Assessment of Supportive Services

To the extent practicable, each program must provide supportive services for residents and homeless clients enrolled in the program, which may be designed by the provider or participants. At the time of eligibility reassessment, each provider of assistance must conduct an assessment of the supportive services needed by the residents, the availability of such services, and the coordination of services needed to ensure long-term housing stability and must make adjustments, as appropriate.

11. Changes in Circumstances.

Participants must notify the provider of changes in the participant's income or other circumstances (for example changes in household composition) that affect the participant's need or eligibility for assistance.

12. Eligibility and Supportive Service Needs Reassessment.

Reassessment of eligibility and needs will occur every 90 days from the date of program entry, or when a participant notifies a provider of any changes described in the 5-3 Suitable Dwelling Size section above.

13. Termination.

The provider may only involuntarily terminate assistance to a household if the client reveals information after program entry that makes them ineligible for the program. Households cannot be terminated for being unresponsive; however, the agency can choose not to extend rental assistance past the initial duration agreed upon by the household and the case manager or to end rental assistance immediately.

14. Eviction

If a household receiving RRH assistance is evicted, the agency must assist the household in locating a new unit and continue providing rental assistance and other services.

15. Due Process.

In terminating assistance or denying an extension to a program participant, the provider must provide a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process, at a minimum, must consist of:

- a. Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance;

- b. Written notice to the program participant containing a clear statement of the reasons for termination or denial of extension;
- c. A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination or denial of extension decision; and
- d. Prompt written notice of the final decision to the program participant.
- e. Additionally, the provider must attempt (and document that attempt) to assist the participant in finding additional resources to decrease the likelihood that they will not become homeless as a result of termination or denial of extension. This assistance must be documented and made available to HCPC staff during site visits, monitoring, and audits.

Attachment A: Prevention and Rapid Rehousing Written Standards Matrix

Requirement	Location in Rapid Housing and Prevention Policy and Procedure
Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG	Referral Process and Household Eligibility: 5. Eligibility, page 6
Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance	Referral Process and Household Eligibility: 1. Referral Process, Page 6; 2. Coordinated Entry, page 6
Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance	General Operating Standards: 1. Progressive Engagement, page 7; 6-1. ESG Rental Assistance, page 9
Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time	General Operating Standards: 1. Progressive Engagement, page 7; 5-4. Rent Reasonableness, page 8; 5-1. ESG Financial Assistance, page 9
Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receive assistance; or the maximum number of times the program participant may receive assistance.	General Operating Standards: 1. Progressive Engagement, page 7; 7-1. ESG Rapid Rehousing Allowable Services, page 10
HMIS participation	Referral Process and Household Eligibility: 4. Homeless Management Information System (HMIS), page 7
Coordination of mainstream benefits/coordinated assessment	Referral Process and Household Eligibility: 6. Mainstream Resources, page 7

DCF Additions

Addition	Location in Rapid Housing and Prevention Policy and Procedure
A section regarding case management and frequency provided;	General Operating Standards: 8. Core Components of Case Management, page 11-12
FMR and rent reasonableness as part of the process of providing rental assistance	General Operating Standards: 5-4. Rent Reasonableness, page 8
Leases are not optional when providing rental assistance	General Operating Standards: 3. Lease Terms, page 8
A Section addressing how long assistance will be provided under HP and RRH, how much (\$) are clients eligible to receive under each, what is the max \$ amount clients are eligible to receive; how often can clients receive assistance (i.e. no more than 3 months (total of \$2500 in assistance) and no more than once in a 12-month period).	General Operating Standards: 1. Progressive Engagement, page 7; 6. Financial Assistance, page 9

Attachment B: Housing Stability Plan Example

The Housing Stability Plan is a set plan, split into stages, that will work to help you find housing, identify who is doing what, and address those things we need to work on in order to get you into an apartment.

Stage 1: What could impact your ability to get a lease?

- Previous evictions: _____
- Unpaid rent or utilities: _____
- No rental history: _____
- Criminal history: _____
- Domestic Violence: _____
- Lack of identification: _____

Stage 2: Now that you have moved in, what happened that led you to be homeless or where do you need support to maintain your new home.

- Income: _____
- Health: _____
- Tenant-Landlord-Neighbor: _____
- Mental Health: _____
- Substance Use: _____
- Domestic Violence: _____
- Other: _____

Goals and Responsibilities (updated each follow-up).

Goals	Who is Responsible	Completion Date	Status/Notes

Attachment C: 24 CFR 5.609

§ 5.609 Annual income.

(a) *Annual income* means all amounts, monetary or not, which:

(1) Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or

(2) Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and

(3) Which are not specifically excluded in paragraph (c) of this section.

(4) Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

(b) Annual income includes, but is not limited to:

(1) The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services;

(2) The net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family;

(3) Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation is permitted only as authorized in paragraph (b)(2) of this section. Any withdrawal of cash or assets from an investment will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested by the family. Where the family has net family assets in excess of \$5,000, annual income shall include the greater of the actual income derived from all net family assets or a percentage of the value of such assets based on the current passbook savings rate, as determined by HUD;

(4) The full amount of periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts, including a lump-sum amount or prospective monthly amounts for the delayed start of a periodic amount (except as provided in paragraph (c)(14) of this section);

(5) Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation and severance pay (except as provided in paragraph (c)(3) of this section);

(6) *Welfare assistance payments.* (i) Welfare assistance payments made under the Temporary Assistance for Needy Families (TANF) program are included in annual income only to the extent such payments:

(A) Qualify as assistance under the TANF program definition at 45 CFR 260.31; and

(B) Are not otherwise excluded under paragraph (c) of this section.

(ii) If the welfare assistance payment includes an amount specifically designated for shelter and utilities that is subject to adjustment by the welfare assistance agency in accordance with the actual cost of shelter and utilities, the amount of welfare assistance income to be included as income shall consist of:

(A) The amount of the allowance or grant exclusive of the amount specifically designated for shelter or utilities; plus

(B) The maximum amount that the welfare assistance agency could in fact allow the family for shelter and utilities. If the family's welfare assistance is ratably reduced from the standard of need by applying a percentage, the amount calculated under this paragraph shall be the amount resulting from one application of the percentage.

(7) Periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from organizations or from persons not residing in the dwelling;

(8) All regular pay, special pay and allowances of a member of the Armed Forces (except as provided in paragraph (c)(7) of this section).

(9) For section 8 programs only and as provided in 24 CFR 5.612, any financial assistance, in excess of amounts received for tuition and any other required fees and charges, that an individual receives under the Higher Education Act of 1965 (20 U.S.C. 1001 *et seq.*), from private sources, or from an institution of higher education (as defined under the Higher Education Act of 1965 (20 U.S.C. 1002)), shall be considered income to that individual, except that financial assistance described in this paragraph is not considered annual income for persons over the age of 23 with dependent children. For purposes of this paragraph, "financial assistance" does not include loan proceeds for the purpose of determining income.

(c) Annual income does not include the following:

(1) Income from employment of children (including foster children) under the age of 18 years;

(2) Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the tenant family, who are unable to live alone);

(3) Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses (except as provided in paragraph (b)(5) of this section);

(4) Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member;

(5) Income of a live-in aide, as defined in § 5.403;

(6) Subject to paragraph (b)(9) of this section, the full amount of student financial assistance paid directly to the student or to the educational institution;

- (7) The special pay to a family member serving in the Armed Forces who is exposed to hostile fire; (8)(i) Amounts received under training programs funded by HUD;
- (ii) Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS);
- (iii) Amounts received by a participant in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred (special equipment, clothing, transportation, child care, etc.) and which are made solely to allow participation in a specific program;
- (iv) Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time;
- (v) Incremental earnings and benefits resulting to any family member from participation in qualifying State or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for the period during which the family member participates in the employment training program;
- (9) Temporary, nonrecurring or sporadic income (including gifts);
- (10) Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;
- (11) Earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of household and spouse);
- (12) Adoption assistance payments in excess of \$480 per adopted child;
- (13) [Reserved]
- (14) Deferred periodic amounts from supplemental security income and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts, or any deferred Department of Veterans Affairs disability benefits that are received in a lump sum amount or in prospective monthly amounts.
- (15) Amounts received by the family in the form of refunds or rebates under State or local law for property taxes paid on the dwelling unit;
- (16) Amounts paid by a State agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home; or

(17) Amounts specifically excluded by any other Federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program

to which the exclusions set forth in 24 CFR 5.609(c) apply. A notice will be published in the FEDERAL REGISTER and distributed to PHAs and housing owners identifying the benefits that qualify for this exclusion. Updates will be published and distributed when necessary.

(d) *Annualization of income.* If it is not feasible to anticipate a level of income over a 12-month period (e.g., seasonal or cyclic income), or the PHA believes that past income is the best available indicator of expected future income, the PHA may annualize the income anticipated for a shorter period, subject to a redetermination at the end of the shorter period.

[61 FR 54498, Oct. 18, 1996, as amended at 65 FR 16716, Mar. 29, 2000; 67 FR 47432, July 18, 2002; 70 FR 77743, Dec. 30, 2005; 79 FR 36164, June 25, 2014; 81 FR 12370, Mar. 8, 2016]

Attachment D: 24 CFR .611

§ 5.611 Adjusted income.

Adjusted income means annual income (as determined by the responsible entity) of the members of the family residing or intending to reside in the dwelling unit, after making the following deductions:

(a) *Mandatory deductions.* In determining adjusted income, the responsible entity must deduct the following amounts from annual income:

(1) \$480 for each dependent;

(2) \$400 for any elderly family or disabled family;

(3) The sum of the following, to the extent the sum exceeds three percent of annual income:

(i) Unreimbursed medical expenses of any elderly family or disabled family; and

(ii) Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed, but this allowance may not exceed the earned income received by family members who are 18 years of age or older who are able to work because of such attendant care or auxiliary apparatus; and

(4) Any reasonable child care expenses necessary to enable a member of the family to be employed or to further his or her education.

(b) *Permissive deductions—for public housing only.* For public housing only, a PHA may adopt additional deductions from annual income. The PHA must establish a written policy for such deductions.

[65 FR 16717, Mar. 29, 2000]

EFFECTIVE DATE NOTE: At 65 FR 16717, Mar. 29, 2000, § 5.611 was revised, effective Apr. 28, 2000. For the convenience of the user, the superseded text is set forth as follows:

§ 5.611 Adjusted income.

Adjusted income means annual income less the following deductions:

(a) \$480 for each dependent;

(b) \$400 for any elderly family or disabled family;

(c) For any family that is not an elderly family or disabled family but has a member (other than the head of household or spouse) who is a person with a disability, disability assistance expenses in excess of three percent of annual income, but this allowance may not exceed the employment income received by family members who are 18 years of age or older as a result of the assistance to the person with disabilities;

(d) For any elderly family or disabled family:

(1) That has no disability assistance expenses, an allowance for medical expenses equal to the amount by which the medical expenses exceed three percent of annual income;

(2) That has disability assistance expenses greater than or equal to three percent of annual income, an allowance for disability assistance expenses computed in accordance with paragraph (c) of this section, plus an allowance for medical expenses that is equal to the family's medical expenses;

(3) That has disability assistance expenses that are less than three percent of annual income, an allowance for combined disability assistance expenses and medical expenses that is equal to the amount by which the sum of these expenses exceeds three percent of annual income; and

(e) Child care expenses.

Attachment E: Resident Rent Calculation Worksheet

Client Name:	Date:	ID:
Part 1 – TOTAL ADJUSTED INCOME DETERMINATION		
ANNUAL GROSS INCOME		
A. Income		
Employment	<u>\$0.00</u>	
Social Security	<u>\$0.00</u>	
Welfare Assistance	<u>\$0.00</u>	
Unemployment	<u>\$0.00</u>	
Disability	<u>\$0.00</u>	
Workers Comp	<u>\$0.00</u>	
Other	<u>\$0.00</u>	
TOTAL INCOME		\$0.00
B. Income Exclusions		
Income from Children > 18	<u>\$0.00</u>	
Payments for Foster Care	<u>\$0.00</u>	
Reimbursement for Medical Expenses	<u>\$0.00</u>	
TOTAL EXCLUSIONS		\$0.00
C. Annual Gross Income (A minus B)		\$0.00
ADJUSTMENTS TO INCOME		
D. Dependent Allowance		
\$480 per dependent		
Number of Dependents	<u>0</u>	\$0.00
E. Child Care Allowance		
For Children 12 years & under		\$0.00
F. Disabled Assistance Allowance		
F1. Disabled Assistance Expense	<u>\$0.00</u>	
F2. Adjusted Amt-Disabled Assistance Exp	<u>\$0.00</u>	
F3. Adjusted Disabled Assistance Care	<u>\$0.00</u>	
F4. Family members earnings dependent on Attendant care	<u>\$0.00</u>	
Lesser of F4 or F5		\$0.00
G. Medical Expense Allowance		
G1. Medical Expense not reimbursed or covered by insurance	<u>\$0.00</u>	
If F3 > 0 enter Medical expenses		
If not, enter F1 + G1		\$0.00
H. Elderly or Disabled Family Allowance		
\$400 per Elderly (62+ yrs/Disabled Member)		
Number of Elderly/Disabled	<u>0</u>	\$0.00

I. Total Allowances (Sum of D thru H) \$0.00

J. Total Adjusted Income (C minus I) \$0.00

Resident Rent Calculation Worksheet

Client Name:	Date:	ID:
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PART II – RESIDENT RENT DETERMINATION

K. Divide TOTAL ADJUSTED INCOME (line J) by 12 and multiply by 30% \$0.00

L. Divide ANNUAL GROSS INCOME by 12 and multiply by 10% \$0.00

M. Amount of Welfare Rent, if applicable \$0.00

N. MAXIMUM RENTAL AMOUNT PER MONTH (Largest of K, L, or M) \$0.00

RESIDENT RENT WHEN UTILITIES ARE NOT INCLUDED IN RENT

M. Utilities Allowance \$0.00

P. Adjusted resident Rent without Utilities \$0.00

Client Signature _____ Date _____

Staff Signature _____ Date _____

Please see the HUD Supportive Housing Desk Guide for more information

Attachment F: Landlord Expectations Letter Example

{date}

Attention:

Building/Complex Name:

Address:

City, State, Zip:

Tenant Name: {Client Name} Unit Number:

Dear {Landlord Name}:

This letter is to inform you that {Client Name} is working with {Agency Name} to help move into an apartment and stay housed. We will provide financial assistance (move-in costs, rental assistance, etc.) and community connections for {Client Name} so that {he/she/they} can successfully meet the terms of {his/her/their} lease and continue pursuing {his/her/their} personal and financial goals.

{Agency Name} will pay 100% of move in costs associated with the lease for this unit. We will inspect the unit, and at the time the lease is signed, we will provide a check for all move-in costs on behalf of this tenant, to be calculated as follows:

Security Deposit: \$_____

Pro-Rated First Month's Rent: \$_____

Last Month Rent: \$_____

Additional Deposit: \$_____

Total Move-In: \$_____

Our program wants to ensure that {Client Name} can maintain their housing for the length of the lease or longer. To make this happen we will be working with {him/her/them} on building community connections, and paying rent. During this time, {Agency Name} will provide monthly rental assistance payable to the landlord on the date that rent is due. The amount of the rental assistance will decrease over time and is calculated based on the tenant's income, and their ability to pay rent.

Please contact me if you have any questions or concerns while you are receiving rental assistance checks from {Agency Name}. We want to fully support {Client Name} in their new housing, and you as well! In the rare occurrence where there is any notice to the household to vacate, or any complaint used to commence an eviction action against the household, please send us a copy.

Thank you for providing this housing opportunity. You have played an integral role in helping someone find a home, and are making this community a better place. We look forward to working with you!

Please stay in touch, and contact me if you have any questions or for assistance.

Sincerely,

{Housing Advocate Name}, {Housing Advocate Title}

{Phone Number}/ {Email}